



# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



MAR 09 2015

Mr. Jerry Frost  
California Resources Production Corp  
9600 Ming Ave, Suite 300  
Bakersfield, CA 93311

**Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)**  
**District Facility # S-1326**  
**Project # 1143924**

Dear Mr. Frost:

Enclosed for your review is the District's analysis of an application for Authorities to Construct for the facility identified above. You requested that Certificates of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. This project authorizes combustion of Thermally Enhanced Oil Recovery (TEOR) and tank vapor control system (TVR) gas in steam generators S-1326-405, '-406, '-407, '-417 and '-418. Also, TEOR operation permits S-1326-26, '-27, '-28, and '-35 and TVR permit '-263 will be revised to list S-1326-405, '-406, '-407, '-417 and '-418 as authorized disposal devices.

After addressing all comments made during the 45-day EPA comment period, the District intends to issue the Authorities to Construct with Certificates of Conformity. Prior to operating with modifications authorized by the Authorities to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Sayed Sadredin  
Executive Director/Air Pollution Control Officer

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**Northern Region**  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585

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Thank you for your cooperation in this matter.

Sincerely,



Arnaud Marjollet  
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

# San Joaquin Valley Air Pollution Control District

## Authority to Construct Application Review

Authorize combustion of TEOR and VCS gas in steam generator

Facility Name: California Resources Production Corp      Date: November 5, 2014  
Mailing Address: 9600 Ming Ave, Suite 300      Engineer: Robert Rinaldi  
Bakersfield, CA 93311      Lead Engineer: Allan Phillips *AP SWR ADE*  
Contact Person: Jerry Frost  
Telephone: (661) 869-8000      MAR 05 2015  
Fax: (661) 869-8059  
E-Mail: Jerry\_Frost@crc.com  
Application #(s): S-1326-26-24 and 9 others  
Project #: 1143924  
Deemed Complete: October 20, 2014

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### I. Proposal

California Resources Production Corp (CRC) has requested Authorities to Construct (ATCs) for authorization to combust Thermally Enhanced Oil Recovery (TEOR) and tank vapor control system (TVR) gas in steam generators S-1326-405, '-406, '-407, '-417 and '-418. TEOR operation permits S-1326-26, '-27, '-28, and '-35 and TVR permit '-263 will be revised to list S-1326-405, '-406, '-407, '-417 and '-418 as authorized disposal devices.

The applicant is proposing that existing limits for all criteria pollutants including the existing limit of 1.0 gr. Sulfur/100 scf for existing steam generators S-1326-405, '-406, '-407, '-417 and '-418 will not be exceeded as a result of allowing waste gas incineration.

Note that FYI 111 (NSR Applicability Determination) Categories 19 and 20 stated below imply that the project is an NSR modification of S-1326-405, '-406, '-407, '-417 and '-418 but is not a NSR modification of the other permit units included in the project. Additional details are provided in the tables below.

FYI-111 (NSR Applicability Determination)

	ATC req'd?	TV application req'd?	NSR mod?	Description	Comments
19	Yes	Yes	No	Allowing a steam generator currently allowed to burn waste gas to burn waste gas from a different source (provided that the steam generator can continue to meet its emission limits)	Not a change in the method of operation if the <u>steam generator was previously approved to burn waste gas.</u>
20	Yes	Yes	No	Allowing a vapor control system to vent to a different permitted disposal device	Not a change in the method of operation of the vapor control system <u>provided that the vapor control system can continue to meet its control efficiency requirement.</u>

Units	FYI 111 Category Applicability	NSR Modification?	Comments
S-1326-26	20	No	No change in vapor control efficiency
S-1326-27	20	No	No change in vapor control efficiency
S-1326-28	20	No	No change in vapor control efficiency
S-1326-35	20	No	No change in vapor control efficiency
S-1326-263	20	No	No change in vapor control efficiency
S-1326-405	19	Yes	Not currently approved to burn waste gas
S-1326-406	19	Yes	Not currently approved to burn waste gas
S-1326-407	19	Yes	Not currently approved to burn waste gas
S-1326-417	19	Yes	Not currently approved to burn waste gas
S-1326-418	19	Yes	Not currently approved to burn waste gas
S-1326-385	19	Yes	Not currently approved to burn waste gas

The project results in no change in emissions. BACT, offsets, and public notice are not required.

CRC received their Title V Permit on August 31, 2001. This modification can be classified as a Title V minor modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. CRC must apply to administratively amend their Title V permit.

## II. Applicable Rules

Rule 2201	New and Modified Stationary Source Review Rule (4/21/11)
Rule 2410	Prevention of Significant Deterioration (6/16/11)
Rule 2520	Federally Mandated Operating Permits (6/21/01)
Rule 4001	New Source Performance Standards (4/14/99)
Rule 4101	Visible Emissions (2/17/05)
Rule 4102	Nuisance (12/17/92)
Rule 4201	Particulate Matter Concentration (12/17/92)
Rule 4301	Fuel Burning Equipment (12/17/92)
Rule 4305	Boilers, Steam Generators and Process Heaters – Phase 2 (8/21/03)
Rule 4306	Boilers, Steam Generators and Process Heaters – Phase 3 (10/16/08)
Rule 4311	Flares (6/15/06)
Rule 4320	Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr (10/16/08)
Rule 4401	Steam Enhanced Crude Oil Production Well Vents (June 16, 2011)
Rule 4623	Storage of Organic Liquids (5/19/05)
Rule 4801	Sulfur Compounds (12/17/92)
CH&SC 41700	Health Risk Assessment
CH&SC 42301.6	School Notice
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)	
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines	

## III. Project Location

Locations of the permit units are listed in the following table:

Heavy Oil Central Stationary Source

Permit	Location
S-1326-26 (TEOR)	NE Section 23, T28S, R27E
S-1326-27 (TEOR)	Section 2, T28S, R27E
S-1326-28 (TEOR)	Section 2, T28S, R27E
S-1326-35 (TEOR)	Section 14, T28S, R27E
S-1326-263 (Tank)	SW Section 23, T28S, R27E
S-1326-405 (SG)	NE Section 23, T28S, R27E
S-1326-406 (SG)	NE Section 23, T28S, R27E
S-1326-407 (SG)	NE Section 23, T28S, R27E
S-1326-417 (SG)	NE Section 23, T28S, R27E
S-1326-418 (SG)	NE Section 23, T28S, R27E

The equipment is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

#### **IV. Process Description**

CRC (S-1326) utilizes steam injection in their heavy oil wells to assist with oil extraction by lowering the viscosity of the oil which reduces the energy required to pump oil to the surface. The casing gas collection systems (S-1326-26, '-27, '-28, and '-35) are authorized to operate 1) with closed vents (the fluids go to tankage with vapor control), 2) utilizing a balanced piping system (vapors contained within the TEOR piping network), 3) piping the vapors to collection systems which discharge to DOGGR disposal well(s), or 4) sending the vapors, scrubbed to remove H<sub>2</sub>S where necessary, to District-approved steam generators or flares for incineration. Note that TEOR operations S-1326-26, '-27, and '-35 have separate 2.9 MMBtu/hr flares and '-28 shares the -27 flare.

Collected vapors from TVR S-1326-263 are authorized to be disposed of in Department of Oil, Gas and Geothermal Resources (DOGGR) approved vapor disposal well(s) or injected into the field fuel gas system for combustion in permit exempt equipment.

#### Proposed Modifications

The project authorizes combustion of Thermally Enhanced Oil Recovery (TEOR) and tank vapor control system (TVR) gas in steam generators S-1326-405, '-406, '-407, '-417 and '-418. TEOR operation permits S-1326-26, '-27, '-28, and '-35 and TVR permit '-263 will be revised to list S-1326-405, '-406, '-407, '-417 and '-418 as authorized disposal devices.

#### **V. Equipment Listing**

##### Pre-Project Equipment Description (from base ATCs and PTOs):

ATC S-1326-26-22: MODIFICATION OF THERMALLY ENHANCED OIL RECOVERY OPERATION WITH WELL VENT VAPOR CONTROL SYSTEM SERVING 120 STEAM ENHANCED WELLS, INCLUDING SULFA-TREAT SYSTEM, GAS TRAPS, COLLECTION PIPING, VAPOR COMPRESSOR WITH ELECTRIC MOTOR, AND PIPING TO FIELD FUEL GAS SYSTEM, APPROVED COMBUSTION DEVICES, DOGGR DISPOSAL WELL, AND FLARE (FANO): ADD STEAM GENERATORS S-1326-419 THROUGH '-425 AS GAS DISPOSAL DEVICES

ATC S-1326-27-19: MODIFICATION OF THERMALLY ENHANCED OIL RECOVERY (TEOR) OPERATION WITH WELL VENT VAPOR CONTROL SYSTEM SERVING UP TO 100 STEAM ENHANCED WELLS INCLUDING: GAS LIQUID SEPERATORS, COMPRESSOR, CONDENSATE HANDLING AND 2.9 MMBTU/HR AIR ASSISTED FLARE (SECTION 2 EAST CVR): ADD STEAM GENERATORS S-1326-419 THROUGH '-425 AS GAS DISPOSAL DEVICES

- ATC S-1326-28-18: MODIFICATION OF THERMALLY ENHANCED OIL RECOVERY OPERATION INCLUDING DEEP EMERGENCY OVERFLOW PIT WITH MESH COVER, HORIZONTAL GAS LIQUID SEPARATOR, AIR-COOLED HEAT EXCHANGER, HORIZONTAL CONDENSATE COLLECTION VESSEL WITH LIQUID TRANSFER PUMPS, 30 HP COMPRESSOR (K-101), 2.9 MMBTU/HR MCGILL STANDBY FLARE (#1011-2) EQUIPPED WITH 2 IN DIA BURNER TIP, AIR ASSIST BLOWER, KO DRUM SHARED WITH PERMIT UNIT S-1326-27, AND WELL VENT VAPOR CONTROL SYSTEM SERVING 150 STEAM DRIVE WELLS: ADD STEAM GENERATORS S-1326-419 THROUGH '425 AS GAS DISPOSAL DEVICES
- ATC S-1326-35-15: MODIFICATION OF THERMALLY ENHANCED OIL RECOVERY OPERATION WITH WELL VENT VAPOR CONTROL SYSTEM SERVING 250 STEAM ENHANCED WELLS, INCLUDING 50 HP COMPRESSOR, ONE AIR-COOLED VAPOR CONDENSER, AND PIPING TO FIELD FUEL GAS SYSTEM, DOGGR DISPOSAL WELL, AND/OR 3.6 MMBTU/HR KALDAIR FLARE INCLUDING TWO 8000 LB SULFATREAT CANISTERS (ONE AS BACKUP) (SECTION 14 YOUNG): ADD STEAM GENERATORS S-1326-419 THROUGH '425 AS GAS DISPOSAL DEVICES
- PTO S-1326-263-21: 3,000 BBL FIXED ROOF WASH TANK SERVED BY TANK VAPORCONTROL SYSTEM SHARED WITH CASING VENT RECOVERY (CVR) SYSTEM LISTED ON S-1326-287 AND CRUDE OIL STORAGE TANKS S-1326-263, -279, -280, -281, -283, -285, AND '315 (SECTION 23 FACILITY)
- PTO S-1326-405-1: 85.0 MMBTU/HR NATURAL GAS -FIRED STEAM GENERATOR WITH NORTH AMERICAN 4231-85-GLE/X8701 GLE BURNER S/N SD857413-01 AND A FLUE GAS RECIRCULATION SYSTEM
- PTO S-1326-406-1: 85.0 MMBTU/HR NATURAL GAS -FIRED STEAM GENERATOR WITH NORTH AMERICAN 4231-85-GLE/X8701 GLE BURNER AND A FLUE GAS RECIRCULATION SYSTEM
- PTO S-1326-407-1: 85.0 MMBTU/HR NATURAL GAS -FIRED STEAM GENERATOR WITH NORTH AMERICAN 4231-85-GLE/X8701 GLE BURNER S/N SD89244-04 AND A FLUE GAS RECIRCULATION SYSTEM
- PTO S-1326-417-0: 85 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH NORTH AMERICAN 4231-85 GLE BURNER (OR EQUIVALENT) AND A FLUE GAS RECIRCULATION SYSTEM
- PTO S-1326-418-0: 85 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH NORTH AMERICAN 4231-85 GLE BURNER (OR EQUIVALENT) AND A FLUE GAS RECIRCULATION SYSTEM

Proposed Modifications:

- S-1326-26-24: MODIFICATION THERMALLY ENHANCED OIL RECOVERY OPERATION WITH WELL VENT VAPOR CONTROL SYSTEM SERVING 120 STEAM ENHANCED WELLS, INCLUDING SULFA-TREAT SYSTEM, GAS TRAPS, COLLECTION PIPING, VAPOR COMPRESSOR WITH ELECTRIC MOTOR, AND PIPING TO FIELD FUEL GAS SYSTEM, APPROVED COMBUSTION DEVICES, DOGGR DISPOSAL WELL, AND FLARE (FANO): DESIGNATE S-1326-405, '-406, '-407, '-417 AND '-418 AS AUTHORIZED DISPOSAL DEVICES.
- S-1326-27-21: MODIFICATION OF THERMALLY ENHANCED OIL RECOVERY (TEOR) OPERATION WITH WELL VENT VAPOR CONTROL SYSTEM SERVING UP TO 100 STEAM ENHANCED WELLS INCLUDING: GAS LIQUID SEPERATORS, COMPRESSOR, CONDENSATE HANDLING AND 2.9 MMBTU/HR AIR ASSISTED FLARE (SECTION 2 EAST CVR): DESIGNATE S-1326-405, '-406, '-407, '-417 AND '-418 AS AUTHORIZED DISPOSAL DEVICES.
- S-1326-28-20: MODIFICATION OF THERMALLY ENHANCED OIL RECOVERY OPERATION INCLUDING DEEP EMERGENCY OVERFLOW PIT WITH MESH COVER, HORIZONTAL GAS LIQUID SEPARATOR, AIR-COOLED HEAT EXCHANGER, HORIZONTAL CONDENSATE COLLECTION VESSEL WITH LIQUID TRANSFER PUMPS, 30 HP COMPRESSOR (K-101), 2.9 MMBTU/HR MCGILL STANDBY FLARE (#1011-2) EQUIPPED WITH 2 IN DIA BURNER TIP, AIR ASSIST BLOWER, KO DRUM SHARED WITH PERMIT UNIT S-1326-27, AND WELL VENT VAPOR CONTROL SYSTEM SERVING 150 STEAM DRIVE WELLS: DESIGNATE S-1326-405, '-406, '-407, '-417 AND '-418 AS AUTHORIZED DISPOSAL DEVICES.
- S-1326-35-17: MODIFICATION OF THERMALLY ENHANCED OIL RECOVERY OPERATION WITH WELL VENT VAPOR CONTROL SYSTEM SERVING 250 STEAM ENHANCED WELLS, INCLUDING 50 HP COMPRESSOR, ONE AIR-COOLED VAPOR CONDENSER, AND PIPING TO FIELD FUEL GAS SYSTEM, DOGGR DISPOSAL WELL, AND/OR 3.6 MMBTU/HR KALDAIR FLARE INCLUDING TWO 8000 LB SULFATREAT CANISTERS (ONE AS BACKUP) (SECTION 14 YOUNG): DESIGNATE UNITS AS APPROVED COMBUSTION DEVICES FOR S-1326-405, '-406, '-407, '-417 AND '-418
- S-1326-263-25: MODIFICATION OF 3,000 BBL FIXED ROOF WASH TANK SERVED BY TANK VAPOR CONTROL SYSTEM SHARED WITH CASING VENT RECOVERY (CVR) SYSTEM LISTED ON S-1326-287 AND CRUDE OIL STORAGE TANKS S-1326-263, -279, -280, -281, -283, -285, AND '-315 (SECTION 23 FACILITY): DESIGNATE S-1326-405, '-406, '-407, '-417 AND '-418 AS AUTHORIZED DISPOSAL DEVICES.



- S-1326-405-2: MODIFICATION OF 85.0 MMBTU/HR NATURAL GAS -FIRED STEAM GENERATOR WITH NORTH AMERICAN 4231-85-GLE/X8701 GLE BURNER S/N SD857413-01 AND A FLUE GAS RECIRCULATION SYSTEM: AUTHORIZE COMBUSTION OF TEOR AND TVR GAS
- S-1326-406-2: MODIFICATION OF 85.0 MMBTU/HR NATURAL GAS -FIRED STEAM GENERATOR WITH NORTH AMERICAN 4231-85-GLE/X8701 GLE BURNER AND A FLUE GAS RECIRCULATION SYSTEM: AUTHORIZE COMBUSTION OF TEOR AND TVR GAS
- S-1326-407-2: MODIFICATION OF 85.0 MMBTU/HR NATURAL GAS -FIRED STEAM GENERATOR WITH NORTH AMERICAN 4231-85-GLE/X8701 GLE BURNER S/N SD89244-04 AND A FLUE GAS RECIRCULATION SYSTEM: AUTHORIZE COMBUSTION OF TEOR AND TVR GAS
- S-1326-417-2: MODIFICATION OF 85 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH NORTH AMERICAN 4231-85 GLE BURNER AND A FLUE GAS RECIRCULATION SYSTEM: AUTHORIZE COMBUSTION OF TEOR AND TVR GAS
- S-1326-418-2: MODIFICATION OF 85 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH COEN QLN-II ULTRA LOW NOX BURNER AND A FLUE GAS RECIRCULATION SYSTEM: AUTHORIZE COMBUSTION OF TEOR AND TVR GAS

Post Project Equipment Description:

- S-1326-26-24: THERMALLY ENHANCED OIL RECOVERY OPERATION WITH WELL VENT VAPOR CONTROL SYSTEM SERVING 120 STEAM ENHANCED WELLS, INCLUDING SULFA-TREAT SYSTEM, GAS TRAPS, COLLECTION PIPING, VAPOR COMPRESSOR WITH ELECTRIC MOTOR, AND PIPING TO FIELD FUEL GAS SYSTEM, APPROVED COMBUSTION DEVICES, DOGGR DISPOSAL WELL, AND FLARE (FANO)
- S-1326-27-21: THERMALLY ENHANCED OIL RECOVERY (TEOR) OPERATION WITH WELL VENT VAPOR CONTROL SYSTEM SERVING UP TO 100 STEAM ENHANCED WELLS INCLUDING: GAS LIQUID SEPERATORS, COMPRESSOR, CONDENSATE HANDLING, APPROVED COMBUSTION DEVICES, AND 2.9 MMBTU/HR AIR ASSISTED FLARE (SECTION 2 EAST CVR)

- S-1326-28-20: THERMALLY ENHANCED OIL RECOVERY OPERATION INCLUDING DEEP EMERGENCY OVERFLOW PIT WITH MESH COVER, HORIZONTAL GAS-LIQUID SEPARATOR, AIR-COOLED HEAT EXCHANGER, HORIZONTAL CONDENSATE COLLECTION VESSEL WITH LIQUID TRANSFER PUMPS, 30 HP COMPRESSOR (K-101), 2.9 MMBTU/HR MCGILL STANDBY FLARE (#1011-2) EQUIPPED WITH 2 IN DIA BURNER TIP, AIR ASSIST BLOWER, KO DRUM SHARED WITH PERMIT UNIT S-1326-27, APPROVED COMBUSTION DEVICES, AND WELL VENT VAPOR CONTROL SYSTEM SERVING 150 STEAM DRIVE WELLS
- S-1326-35-17: THERMALLY ENHANCED OIL RECOVERY OPERATION WITH WELL VENT VAPOR CONTROL SYSTEM SERVING 250 STEAM ENHANCED WELLS, INCLUDING 50 HP COMPRESSOR, ONE AIR-COOLED VAPOR CONDENSER, AND PIPING TO FIELD FUEL GAS SYSTEM, DOGGR DISPOSAL WELL, APPROVED COMBUSTION DEVICES, AND/OR 3.6 MMBTU/HR KALDAIR FLARE INCLUDING TWO 8000 LB SULFATREAT CANISTERS (ONE AS BACKUP) (SECTION 14 YOUNG)
- S-1326-263-25: 3,000 BBL FIXED ROOF WASH TANK SERVED BY TANK VAPOR CONTROL SYSTEM SHARED WITH CASING VENT RECOVERY (CVR) SYSTEM LISTED ON S-1326-287, AND CRUDE OIL STORAGE TANKS S-1326-263, -279, -280, -281, -283, -285, AND -315 AND APPROVED COMBUSTION DEVICES (SECTION 23 FACILITY)
- S-1326-405-2: 85.0 MMBTU/HR NATURAL/WASTE GAS -FIRED STEAM GENERATOR WITH NORTH AMERICAN 4231-85-GLE/X8701 GLE BURNER S/N SD857413-01 AND A FLUE GAS RECIRCULATION SYSTEM
- S-1326-406-2: 85.0 MMBTU/HR NATURAL/WASTE GAS -FIRED STEAM GENERATOR WITH NORTH AMERICAN 4231-85-GLE/X8701 GLE BURNER AND A FLUE GAS RECIRCULATION SYSTEM
- S-1326-407-2: 85.0 MMBTU/HR NATURAL/WASTE GAS -FIRED STEAM GENERATOR WITH NORTH AMERICAN 4231-85-GLE/X8701 GLE BURNER S/N SD89244-04 AND A FLUE GAS RECIRCULATION SYSTEM
- S-1326-417-2: 85 MMBTU/HR NATURAL/WASTE GAS-FIRED STEAM GENERATOR WITH NORTH AMERICAN 4231-85 GLE BURNER AND A FLUE GAS RECIRCULATION SYSTEM
- S-1326-418-2: 85 MMBTU/HR NATURAL/WASTE GAS-FIRED STEAM GENERATOR WITH COEN QLN-II ULTRA LOW NOX BURNER AND A FLUE GAS RECIRCULATION SYSTEM

## VI. Emission Control Technology Evaluation

Vapors from TEOR (operated with open or closed casing vents) and TVR operations are controlled with an expected vapor control efficiency of 99% by permit conditions. No change in control technology for steam generators is proposed.

## VII. General Calculations

### A. Assumptions

- Facility operates 24 hr/day, 365 days/yr.

S-1326-26, '-27, '-28, '-35 and '-263:

These units are not being modified and therefore requirements of BACT, offsets, and public notice do not need to be considered. PE2 will be restated for inclusion in the PAS emissions profile.

VOC content of vapors is < 10% by weight and therefore fugitive emissions are zero by District policy SSP 2015.

Flare Heat Inputs:

'-26, '-27, '-28: 2.9 MMBtu/hr

'-35: 150 MMBtu/day (6.25 MMBtu/hr) by permit condition

S-1326-405, '-406, '-407, '-417 and '-418:

- Steam generators operates 24 hours/day and 365 days/week.
- Steam generators are fired exclusively on gaseous fuels.
- There will be no change in current permitted emissions rates, daily and annual potential to emit for NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, CO, and VOC.
- F-Factor for Natural Gas: 8,578 dscf/MMBtu corrected to 60°F (40 CFR 60, Appendix B)

## B. Emission Factors

S-1326-26-21, '-27-18, '-28-17, '-35-14

Flares:

Emission Factors	
Pollutant	EF <sup>1</sup> (lb/MMBtu)
NO <sub>x</sub>	0.068
SO <sub>x</sub>	0.00285*
PM <sub>10</sub>	0.008
CO	0.370
VOC	0.063

\*1 gr S/100 scf

S-1326-405, '-406, '-407, '-417 and '-418:

Steam Generators:

Pollutant	Pre- and Post-Project Emission Factors (EF1 and EF2)		Source
NO <sub>x</sub>	0.008 lb-NO <sub>x</sub> /MMBtu	7 pmvd NO <sub>x</sub> (@ 3%O <sub>2</sub> )	Current permit
SO <sub>x</sub>	0.00285 lb-SO <sub>x</sub> /MMBtu		"
PM10	0.003 lb-PM10/MMBtu		"
CO	0.0185 lb-CO/MMBtu	25 ppmvd CO (@ 3%O <sub>2</sub> )	"
VOC	0.0055 lb-VOC/MMBtu		"

<sup>1</sup> Based on District Guidance Document FYI-83, "Use of AP-42 Section 13.5 Emission Factors for Industrial Flares".

## C. Calculations

### 1. Pre-Project Potential to Emit (PE1)

S-1326-405, '-406, '-407, '-417 and '-418:

Pollutant	Daily PE1			
	EF1 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/day)	Daily PE1 (lb/day)
<b>NO<sub>x</sub></b>	0.008	85	24	16.3
<b>SO<sub>x</sub></b>	0.00285	85	24	5.8
<b>PM<sub>10</sub></b>	0.0030	85	24	6.1
<b>CO</b>	0.019	85	24	37.7
<b>VOC</b>	0.0055	85	24	11.2

Pollutant	Annual PE1			
	EF1 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/year)	Annual PE1 (lb/year)
<b>NO<sub>x</sub></b>	0.008	85	8,760	5,957
<b>SO<sub>x</sub></b>	0.00285	85	8,760	2,122
<b>PM<sub>10</sub></b>	0.0030	85	8,760	2,234
<b>CO</b>	0.019	85	8,760	13,775
<b>VOC</b>	0.0055	85	8,760	4,095

### 2. Post-Project Potential to Emit (PE2)

The PE2 for each pollutant is calculated with the following equation:

- $PE2 = EF \text{ (lb/MMBtu)} \times \text{Heat Input (MMBtu/hr)} \times \text{Op. Sched. (hr/day or hr/year)}$

'-26, '-27, and '-28\* flare

Pollutant	Daily PE2			
	EF2 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/day)	Daily PE2 (lb/day)
NO <sub>x</sub>	0.0680	2.9	24	4.7
SO <sub>x</sub>	0.00285	2.9	24	0.2
PM <sub>10</sub>	0.0080	2.9	24	0.6
CO	0.370	2.9	24	25.8
VOC	0.0630	2.9	24	4.4

Pollutant	Annual PE2			
	EF2 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/year)	Annual PE2 (lb/year)
NO <sub>x</sub>	0.068	2.9	8,760	1,727
SO <sub>x</sub>	0.00285	2.9	8,760	72
PM <sub>10</sub>	0.0080	2.9	8,760	203
CO	0.370	2.9	8,760	9,399
VOC	0.0630	2.9	8,760	1,600

\*flare is shared between '-27 and '-28, emissions are included on '-27 only

'-35 flare (150 MMBtu/day, 6.25 MMBtu/hr by permit condition)

Pollutant	Daily PE2			
	EF2 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/day)	Daily PE2 (lb/day)
NO <sub>x</sub>	0.0670	6.25	24	10.1
SO <sub>x</sub>	0.00285	6.25	24	0.4
PM <sub>10</sub>	0.0080	6.25	24	1.2
CO	0.370	6.25	24	55.5
VOC	0.0630	6.25	24	9.5

Pollutant	Annual PE2			
	EF2 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/year)	Annual PE2 (lb/year)
NO <sub>x</sub>	0.067	6.25	8,760	3,668
SO <sub>x</sub>	0.00285	6.25	8,760	156
PM <sub>10</sub>	0.0080	6.25	8,760	438
CO	0.370	6.25	8,760	20,258
VOC	0.0630	6.25	8,760	3,449

S-1326-263

VOC: 0 lb/day, 0 lb/yr

S-1326-405, '-406, '-407, '-417 and '-418:

Pollutant	Daily PE2			
	EF2 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/day)	Daily PE2 (lb/day)
<b>NO<sub>x</sub></b>	0.0080	85	24	16.3
<b>SO<sub>x</sub></b>	0.00285	85	24	5.8
<b>PM<sub>10</sub></b>	0.0030	85	24	6.1
<b>CO</b>	0.019	85	24	37.7
<b>VOC</b>	0.0055	85	24	11.2

Pollutant	Annual PE2			
	EF2 (lb/MMBtu)	Heat Input (MMBtu/hr)	Operating Schedule (hr/year)	Annual PE2 (lb/year)
<b>NO<sub>x</sub></b>	0.008	85	8,760	5,957
<b>SO<sub>x</sub></b>	0.00285	85	8,760	2,122
<b>PM<sub>10</sub></b>	0.0030	85	8,760	2,234
<b>CO</b>	0.019	85	8,760	13,775
<b>VOC</b>	0.0055	85	8,760	4,095

Emissions profiles are included in **Attachment II**.

### 3. Pre-Project Stationary Source Potential to Emit (SSPE1)

Pursuant to Section 4.9 of District Rule 2201, the Pre-Project Stationary Source Potential to Emit (SSPE1) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site. No ERCs have been banked from this source.

The SSPE1 was obtained from the SSPE2 for District project 1133790 (the most recent NSR project finalized in PAS). No ERCs have been banked from this source.

<b>Pre-Project Stationary Source Potential to Emit [SSPE1] (lb/year)</b>					
	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
Pre-Project SSPE (SSPE1)	147,133	51,780	51,941	348,451	180,962

### 4. Post Project Stationary Source Potential to Emit (SSPE2)

Pursuant to Section 4.10 of District Rule 2201, the Post Project Stationary Source Potential to Emit (SSPE2) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

<b>Post Project Stationary Source Potential to Emit [SSPE2] (lb/year)</b>					
	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
Post Project SSPE (SSPE2)	147,133	51,780	51,941	348,451	180,962



## 5. Major Source Determination

### Rule 2201 Major Source Determination:

Pursuant to District Rule 2201, a Major Source is a stationary source with a SSPE2 equal to or exceeding one or more of the following threshold values. For the purposes of determining major source status the following shall not be included:

- any ERCs associated with the stationary source
- Emissions from non-road IC engines (i.e. IC engines at a particular site at the facility for less than 12 months)
- Fugitive emissions, except for the specific source categories specified in 40 CFR 51.165

Rule 2201 Major Source Determination (lb/year)					
	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
Facility emissions pre-project	147,133	51,780	51,941	348,451	180,962
Facility emissions – post project	147,133	51,780	51,941	348,451	180,962
Major Source Threshold	20,000	140,000	140,000	200,000	20,000
Major Source?	Yes	No	No	Yes	Yes

<sup>1</sup>Since the facility is expected to be over the major source threshold for VOCs regardless of excluding fugitive emissions, these values were not recalculated from the SSPE1 and SSPE2 listed previously (this value contains all fugitive VOC emissions at the source).

As seen in the table above, the facility is an existing Major Source for NO<sub>x</sub>, CO, and VOC only and will remain a major source for only these pollutants as a result of this project.

### Rule 2410 Major Source Determination:

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). Therefore the following PSD Major Source thresholds are applicable.

	NO <sub>2</sub>	VOC	SO <sub>2</sub>	CO	PM	PM <sub>10</sub>
Estimated Facility PE before Project Increase	74	90	26	174	26 <sup>1</sup>	26
PSD Major Source Thresholds	250	250	250	250	250	250
PSD Major Source ? (Y/N)	N	N	N	N	N	N

<sup>1</sup>Since PM emissions from this source are primarily the result of gas combustion and generally all PM emissions from gas consumption are less than 10 microns in diameter, it is assumed that all PM is PM<sub>10</sub>

<sup>2</sup>facility has outstanding ATCs for several 85 MMBtu/hr SGs and additional combustion equipment

As shown in the preceding table, the facility is not an existing major source for PSD.

## 6. Baseline Emissions (BE)

The BE calculation (in lbs/year) is performed pollutant-by-pollutant for each unit within the project, to calculate the QNEC and if applicable, to determine the amount of offsets required.

Pursuant to Section 3.7 of District Rule 2201, BE = Pre-project Potential to Emit for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to District Rule 2201.

### Clean Emissions Unit, Located at a Major Source

Pursuant to Rule 2201, a Clean Emissions Unit is defined as an emissions unit that is "equipped with an emissions control technology with a minimum control efficiency of at least 95% or is equipped with emission control technology that meets the requirements for achieved-in-practice BACT as accepted by the APCO during the five years immediately prior to the submission of the complete application.

S-1326 is not a major source for SO<sub>x</sub> and PM<sub>10</sub> and therefore BE = PE1 for these air contaminants.

As steam generators S-1326-405, '-406, '-407, '-417 and '-418 meet the requirements of Achieved-in-Practice BACT \* for PM<sub>10</sub>, NO<sub>x</sub>, CO, and VOC they are clean emissions units. These requirements are as follows:

NO<sub>x</sub>: 7 ppmv @ 3% O<sub>2</sub> or 0.008 lb/MMBtu (Rule 4320)

CO: 25 ppmv @ 3% O<sub>2</sub>

VOC: combustion of gaseous fuel

PM<sub>10</sub>: combustion of gaseous fuel

\*BACT Guideline 1.2.1 has been rescinded for NO<sub>x</sub>. The new NO<sub>x</sub> requirement is the Rule 4320 limit of 7 ppmv @ 3% O<sub>2</sub> (0.008 lb/MMBtu). The CO (50 ppmv @ 3% O<sub>2</sub>), PM<sub>10</sub> and VOC (gaseous fuel) requirements of BACT Guideline 1.2.1 are met.

## 7. SB 288 Major Modification

SB 288 Major Modification is defined in 40 CFR Part 51.165 as "any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act."

Since this facility is a major source for NO<sub>x</sub> and VOCs, the project's PE2 is compared to the SB 288 Major Modification Thresholds in the following table in order to determine if the SB 288 Major Modification calculation is required.

SB 288 Major Modification Thresholds			
Pollutant	Project PE2 (lb/year)	Threshold (lb/year)	SB 288 Major Modification Calculation Required?
NO <sub>x</sub>	29,785	50,000	No
VOC	20,475	50,000	No

## 8. Federal Major Modification

District Rule 2201, Section 3.17 states that Federal Major Modifications are the same as "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA. SB 288 Major Modifications are not Federal Major Modifications if they meet the criteria of the "Less-Than-Significant Emissions Increase" exclusion.

The applicant is requesting authorization to combust Thermally Enhanced Oil Recovery (TEOR) and tank vapor control system (TVR) gas in existing steam generators S-1326-405, '-406, '-407, '-417 and '-418 and states that existing limits for all criteria pollutants including the existing limit of 1.0 gr. Sulfur/100 scf for existing steam generators will not be exceeded as a result of allowing waste gas incineration.

A Less-Than-Significant Emissions Increase exclusion is for an emissions increase for the project, or a Net Emissions Increase for the project (as defined in 40 CFR 51.165 (a)(2)(ii)(B) through (D), and (F)), that is not significant for a given regulated NSR pollutant, and therefore is not a Federal Major Modification for that pollutant.

- To determine the post-project projected actual emissions from existing units, the provisions of 40 CFR 51.165 (a)(1)(xxviii) shall be used.
- To determine the pre-project baseline actual emissions, the provisions of 40 CFR 51.165 (a)(1)(xxxv)(A) through (D) shall be used.
- If the project is determined not to be a Federal Major Modification pursuant to the provisions of 40 CFR 51.165 (a)(2)(ii)(B), but there is a reasonable possibility that the project may result in a significant emissions increase, the owner or operator shall comply with all of the provisions of 40 CFR 51.165 (a)(6) and (a)(7).
- Emissions increases calculated pursuant to this section are significant if they exceed the significance thresholds specified in the table below.

Pollutant	Threshold (lb/year)
VOC	0
NOx	0
PM10	30,000
SOx	80,000

The Net Emissions Increases (NEIs) for purposes of determination of a “Less-Than-Significant Emissions Increase” exclusion will be calculated below to determine if this project qualifies for such an exclusion.

Authorization to combust waste gas in S-1326-405, ‘-406, ‘-407, ‘-417 and ‘-418 will not result in an increase in design capacity, and does not impact the ability of the emission unit to operate at a higher utilization rate (there will be no change capacity). Therefore, the unused baseline capacity emissions (portion of PAE that units could have accommodated) can also be excluded from the project Net Emissions Increase (NEI) calculation as follows:

$$\text{NEI} = \text{PAE} - \text{BAE} - \text{unused baseline capacity emissions}$$

The District has determined that the units could have emitted PAE during the baseline period (when they emitted BAE) and therefore the unused baseline emissions are equal to PAE – BAE and NEI = 0. Therefore the project is not a Federal Major Modification.

## 9. Quarterly Net Emissions Change (QNEC)

The Quarterly Net Emissions Change is used to complete the emission profile screen for the District’s PAS database. There is no change in annual emissions from S-1326-405, ‘-406, ‘-407, ‘-417 and ‘-418 and therefore QNEC = 0.

## VIII. Compliance

### Rule 2201 New and Modified Stationary Source Review Rule

#### A. Best Available Control Technology (BACT)

##### 1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis. Unless specifically exempted by Rule 2201, BACT shall be required for the following actions\*:

- a. Any new emissions unit with a potential to emit exceeding two pounds per day,
- b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
- c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
- d. Any new or modified emissions unit, in a stationary source project, which results in an SB 288 Major Modification or a Federal Major Modification, as defined by the rule.

\*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

##### a. New emissions units – PE > 2 lb/day

As discussed in Section I above, there are no new emissions units associated with this project. Therefore BACT for new units with PE > 2 lb/day purposes is not triggered.

##### b. Relocation of emissions units – PE > 2 lb/day

As discussed in Section I above, there are no emissions units being relocated from one stationary source to another; therefore BACT is not triggered.

**c. Modification of emissions units – AIPE > 2 lb/day**

$$\text{AIPE} = \text{PE2} - \text{HAPE}$$

Where,

AIPE = Adjusted Increase in Permitted Emissions, (lb/day)

PE2 = Post-Project Potential to Emit, (lb/day)

HAPE = Historically Adjusted Potential to Emit, (lb/day)

$$\text{HAPE} = \text{PE1} \times (\text{EF2}/\text{EF1})$$

Where,

PE1 = The emissions unit's PE prior to modification or relocation, (lb/day)

EF2 = The emissions unit's permitted emission factor for the pollutant after modification or relocation. If EF2 is greater than EF1 then EF2/EF1 shall be set to 1

EF1 = The emissions unit's permitted emission factor for the pollutant before the modification or relocation

$$\text{AIPE} = \text{PE2} - (\text{PE1} * (\text{EF2} / \text{EF1}))$$

S-1326-405, '-406, '-407, '-417 and '-418:

EF1 = EF2 and PE1 = PE2 for NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, CO, and VOCs

Therefore AIPE = 0 for these air contaminants.

**d. SB 288/Federal Major Modification**

As discussed in Section VII.C.7 above, this project does not constitute an SB 288 and/or Federal Major Modification for any pollutant. Therefore BACT is not triggered for any pollutant.

## B. Offsets

### 1. Offset Applicability

Pursuant to Section 4.5.3, offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the Post Project Stationary Source Potential to Emit (SSPE2) equals to or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

The following table compares the post-project facility-wide annual emissions in order to determine if offsets will be required for this project.

Offset Determination (lb/year)					
	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
Post Project SSPE (SSPE2)	147,133	51,780	51,941	348,451	180,962
	51,780	51,941	348,451	180,962	20,000
Offset calculations required?	Yes	No	Yes	Yes	Yes

### 2. Quantity of Offsets Required

As seen above, the facility is an existing Major Source for NO<sub>x</sub>, PM10, CO, and VOC and the SSPE2 is greater than the offset thresholds. Therefore offset calculations will be required for this project.

The quantity of offsets in pounds per year for NO<sub>x</sub> is calculated as follows for sources with an SSPE1 greater than the offset threshold levels before implementing the project being evaluated.

Offsets Required (lb/year) =  $(\Sigma[PE2 - BE] + ICCE) \times DOR$ , for all new or modified emissions units in the project,

Where,

PE2 = Post Project Potential to Emit, (lb/year)

BE = Baseline Emissions, (lb/year)

ICCE = Increase in Cargo Carrier Emissions, (lb/year)

DOR = Distance Offset Ratio, determined pursuant to Section 4.8

BE = PE1 for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, Located at a Major Source.

otherwise,

$$BE = HAE$$

As calculated in Section VII.C.6 above, the BE from this unit are equal to the PE1 since the units are Clean Emissions Units.

There are no increases in cargo carrier emissions. Therefore offsets can be determined as follows:

$$\text{Offsets Required (lb/year)} = ([PE2 - BE] + ICCE) \times DOR$$

In all cases  $PE2 = BE$ ; therefore the amount of offsets required is zero.



## C. Public Notification

### 1. Applicability

Public noticing is required for:

- a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications,
- b. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
- c. Any project which results in the offset thresholds being surpassed, and/or
- d. Any project with an SSPE of greater than 20,000 lb/year for any pollutant.

#### a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications

New Major Sources are new facilities, which are also Major Sources. Since this is not a new facility, public noticing is not required for this project for New Major Source purposes.

As demonstrated in VII.C.7, this project does not constitute an SB 288 or Federal Major Modification; therefore, public noticing for SB 288 or Federal Major Modification purposes is not required.

#### b. PE > 100 lb/day

Applications which include a new emissions unit with a PE greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. As seen in Section VII.C.2 above, this project does not include a new emissions unit, therefore public noticing for PE > 100 lb/day purposes is not required.

#### c. Offset Threshold

The SSPE1 and SSPE2 are compared to the offset thresholds in the following table.

Offset Thresholds				
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	Offset Threshold	Public Notice Required?
NO <sub>x</sub>	147,133	147,133	20,000 lb/year	No
SO <sub>x</sub>	51,780	51,780	54,750 lb/year	No
PM <sub>10</sub>	51,941	51,941	29,200 lb/year	No
CO	348,451	348,451	200,000 lb/year	No
VOC	180,962	180,962	20,000 lb/year	No

As detailed above, there were no thresholds surpassed with this project; therefore public noticing is not required for offset purposes.

**d. SSIPE > 20,000 lb/year**

Public notification is required for any permitting action that results in a SSIPE of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE = SSPE2 – SSPE1. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table.

<b>SSIPE Public Notice Thresholds</b>					
Pollutant	SSPE2 (lb/year)	SSPE1 (lb/year)	SSIPE (lb/year)	SSIPE Public Notice Threshold	Public Notice Required?
NO <sub>x</sub>	147,133	147,133	0	20,000 lb/year	No
SO <sub>x</sub>	51,780	51,780	0	20,000 lb/year	No
PM <sub>10</sub>	51,941	51,941	0	20,000 lb/year	No
CO	348,451	348,451	0	20,000 lb/year	No
VOC	180,962	180,962	0	20,000 lb/year	No

As demonstrated in the preceding table, the SSIPEs for all pollutants were less than 20,000 lb/year; therefore public noticing for SSIPE purposes is not required.

**2. Public Notice Action**

As discussed above, public noticing is not required for this project.

**D. Daily Emission Limits (DELs)**

DELs and other enforceable conditions are required by Rule 2201 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. The DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

**Proposed (Current) Rule 2201 (DEL) Conditions:**

S-1326-405, '-406, '-407, '-417 and '-418:

Emissions rates from the unit shall not exceed any of the following emission limits: 7 ppmv NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.008 lb NO<sub>x</sub>/MMBtu, 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.003 lb-PM<sub>10</sub>/MMBtu, 25 ppmv CO @ 3% O<sub>2</sub> or 0.0185 lb CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Y

## **E. Compliance Assurance**

### **1. Source Testing**

This unit is subject to District Rule 4305, *Boilers, Steam Generators and Process Heaters, Phase 2*, District Rule 4306, *Boilers, Steam Generators and Process Heaters, Phase 3*, and District Rule 4320 *Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr*. Source testing requirements, in accordance with District Rules 4305, 4306, and 4320 will be discussed in Section VIII, District Rule 4320 of this evaluation.

### **2. Monitoring**

As required by District Rule 4305, *Boilers, Steam Generators and Process Heaters, Phase 2*, District Rule 4306, *Boilers, Steam Generators and Process Heaters, Phase 3*, and District Rule 4320 *Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr*, this unit is subject to monitoring requirements. Monitoring requirements, in accordance with District Rules 4305, 4306, and 4320 will be discussed in Section VIII, District Rule 4320 of this evaluation.

### **3. Recordkeeping**

As required by District Rule 4305, *Boilers, Steam Generators and Process Heaters, Phase 2*, District Rule 4306, *Boilers, Steam Generators and Process Heaters, Phase 3*, and District Rule 4320 *Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr*, this unit is subject to recordkeeping requirements. Recordkeeping requirements, in accordance with District Rules 4305, 4306, and 4320 will be discussed in Section VIII, District Rule 4320 of this evaluation.

The following permit condition will be listed on permit as follows:

{2983} All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320]

### **4. Reporting**

No reporting is required to demonstrate compliance with Rule 2201.

## **Rule 2520 Federally Mandated Operating Permits**

CRC received their Title V Permit on August 31, 2001. This modification can be classified as a Title V minor modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. CRC must apply to administratively amend their Title V permit.

## **Rule 4001 New Source Performance Standards**

40 CFR Part 60, Subpart Dc applies to Small Industrial-Commercial-Industrial Steam Generators between 10 MMBtu/hr and 100 MMBtu/hr (post-6/9/89 construction, modification or, reconstruction)

40 CFR Part 60, Subpart A, section 14, defines the meaning of modification to which the standards are applicable. §60.14, paragraph (e)(5) states that the following will not be considered as a modification: *"the addition or use of any system or device whose primary function is the reduction of air pollutants, except when an emission control system is removed or replaced by a system which the Administrator determines to be less environmentally beneficial"*.

No newly constructed or reconstructed units are proposed in this project, nor is the unit being modified (as defined above). Since the permittee is retrofitting the unit with an equivalent size, or smaller, burner for compliance with District rules and regulations, the requirements of these sections are not triggered due to the proposed modification.

## **Rule 4101 Visible Emissions**

District Rule 4101, Section 5.0, indicates that no air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour, which is dark or darker than Ringelmann 1 or equivalent to 20% opacity. The unit is currently operating in compliance and authorization to combust TEOR gas is not expected to affect compliance status. Continued compliance is expected.

## **Rule 4102 Nuisance**

Rule 4102 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, compliance with this rule is expected.

## **California Health & Safety Code 41700 (Health Risk Assessment)**

District Policy APR 1905 – *Risk Management Policy for Permitting New and Modified Sources* specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

As demonstrated above, there are no increases in emissions associated with this project, therefore a health risk assessment is not necessary and no further risk analysis is required.

### **Rule 4201 Particulate Matter Concentration**

Section 3.1 prohibits discharge of dust, fumes, or total particulate matter into the atmosphere from any single source operation in excess of 0.1 grain per dry standard cubic foot. The unit is currently operating in compliance and authorization to combust TEOR gas is not expected to affect compliance status. Continued compliance is expected.

### **Rule 4301 Fuel Burning Equipment**

This rule specifies maximum emission rates in lb/hr for SO<sub>2</sub>, NO<sub>2</sub>, and combustion contaminants (defined as total PM in Rule 1020). This rule also limits combustion contaminants to  $\leq 0.1$  gr/scf. According to AP 42 (Table 1.4-2, footnote c), all PM emissions from natural gas combustion are less than 1  $\mu$ m in diameter. The unit is currently operating in compliance and authorization to combust TEOR gas is not expected to affect compliance status. Continued compliance is expected.

### **Rules 4305 and 4306 Boilers, Steam Generators and Process Heaters – Phase 2 and Phase 3**

The unit is gas-fired with a maximum heat input of 85 MMBtu/hr. The unit is subject to District Rules 4305 and 4306, *Boilers, Steam Generators and Process Heaters – Phase 2 and Phase 3*.

In addition, the unit is also subject to District Rule 4320, *Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr*

Since emissions limits of District Rule 4320 and all other requirements are equivalent or more stringent than District Rules 4305 and 4306 requirements, compliance with District Rule 4320 requirements will satisfy requirements of District Rules 4305 and 4306.

### **Rule 4320 Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr**

This rule applies to any gaseous fuel or liquid fuel fired boiler, steam generator, or process heater with a rated heat input greater than 5 million Btu per hour.

The steam generator is operating in compliance with emission limits, monitoring provisions, and testing requirements of this rule and the project is not expected to affect compliance status. Continued compliance is expected.

### **Rule 4311 Flares**

The purpose of this rule is to limit the emissions of volatile organic compounds (VOC), oxides of nitrogen (NO<sub>x</sub>), and sulfur oxides (SO<sub>x</sub>) from the operation of flares. This rule is applicable to all operations involving the use of flares.

Rule 4311 limits the emissions of volatile organic compounds (VOCs) and oxides of nitrogen (NO<sub>x</sub>), and sulfur from the operation of flares. Conditions demonstrating compliance are included on the PTOs and the project is not expected to affect compliance status. Continued compliance is expected.

### **Rule 4401 Steam Enhanced Crude Oil Production Well Vents**

This rule limits VOC emissions from thermally-enhanced crude oil production well vents. The steam-enhanced crude oil well production vapors are (and will be) routed to flares and steam generators S-1326-405, '-406, '-407, '-417 and '-418 for incineration. Therefore the requirement of 99% control as required by Section 5.1 of the rule is expected to be met. Permit conditions requiring compliance with the vapor control efficiency, I&M program, and record-keeping requirements of this rule are included on current PTOs and proposed ATCs. Continued compliance is expected.

### **Rule 4623 Storage of Organic Liquids**

Tank S-1326-263 currently meets Rule 4623 requirements. Continued compliance is expected.

### **Rule 4801 Sulfur Compounds**

A person shall not discharge into the atmosphere sulfur compounds, which would exist as a liquid or gas at standard conditions, exceeding in concentration at the point of discharge: 0.2 % by volume calculated as SO<sub>2</sub>, on a dry basis averaged over 15 consecutive minutes.

Compliance with the requirements of Rule 4320 ensures that the much higher emission limits of Rule 4801 will be met. Continued compliance is expected.

### **California Health & Safety Code 42301.6 (School Notice)**

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

## California Environmental Quality Act (CEQA)

CEQA requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The District adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that all project specific emission unit(s) are exempt from Best Available Control Technology (BACT) requirements. Furthermore, the District has determined that potential emission increases would have a less than significant health impact on sensitive receptors.

Issuance of permits for emissions units not subject to BACT requirements and with health impact less than significant is a matter of ensuring conformity with applicable District rules and regulations and does not require discretionary judgment or deliberation. Thus, the District concludes that this permitting action constitutes a ministerial approval. Section 21080 of the Public Resources Code exempts from the application of CEQA those projects over which a public agency exercises only ministerial approval. Therefore, the District finds that this project is exempt from the provisions of CEQA.

## IX. Recommendation

Compliance with all applicable rules and regulations is expected. Issue ATCs S-1326-26, '-27, '-28, '-35, '-263, '-405-2, '-406-2, '-407-2, '-417-2 and '-418-2 subject to the permit conditions on the attached draft ATC in **Attachment IV**.

## X. Billing Information

Annual Permit Fees			
ATC Number	Fee Schedule	Fee Description	Annual Fee
S-1326-26	3020-09A	120 wells	\$1120.80
S-1326-27	3020-09A	100 wells	\$934.00
S-1326-28	3020-09A	150 wells	\$1401.00
S-1326-35	3020-09A	250 wells	\$2235.00
S-1326-263	3020-05E	126,000 gallons	\$246.00
S-1326-405	3020-02H	85 MMBtu/hr	\$1030.00
S-1326-406	3020-02H	85 MMBtu/hr	\$1030.00
S-1326-407	3020-02H	85 MMBtu/hr	\$1030.00
S-1326-417	3020-02H	85 MMBtu/hr	\$1030.00
S-1326-418	3020-02H	85 MMBtu/hr	\$1030.00

## Attachments

- I: Existing PTOs and Base Documents
- II: Emissions Profiles
- III: Draft ATCs



# Attachment I

## Existing PTOs and Base Documents



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-1326-26-22

**ISSUANCE DATE:** 03/20/2014

**LEGAL OWNER OR OPERATOR:** VINTAGE PRODUCTION CALIFORNIA LLC

**MAILING ADDRESS:** 9600 MING AVE, SUITE 300  
BAKERSFIELD, CA 93311

**LOCATION:** HEAVY OIL CENTRAL STATIONARY SOURCE  
KERN COUNTY, CA

**SECTION:** NE23 **TOWNSHIP:** 28S **RANGE:** 27E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF THERMALLY ENHANCED OIL RECOVERY OPERATION WITH WELL VENT VAPOR CONTROL SYSTEM SERVING 120 STEAM ENHANCED WELLS, INCLUDING SULFA-TREAT SYSTEM, GAS TRAPS, COLLECTION PIPING, VAPOR COMPRESSOR WITH ELECTRIC MOTOR, AND PIPING TO FIELD FUEL GAS SYSTEM, APPROVED COMBUSTION DEVICES, DOGGR DISPOSAL WELL, AND FLARE (FANO): ADD STEAM GENERATORS S-1326-419 THROUGH '-425 AS GAS DISPOSAL DEVICES

## CONDITIONS

1. Authority to Construct (ATC) S-1326-26-21 shall be implemented prior to or concurrently with this ATC. [District Rule 2201]
2. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
3. TEOR operation shall include sulfatreat system, gas traps, collection piping, vapor compressor with electric motor, piping to field fuel gas system, piping to steam generators S-1326-9, '-294, '-314, '-337, '-338, '-385, '-390, '-391, '-392, '-400, '-401, and '-419 through '-425, DOGGR disposal well and flare (Fano). [District Rule 2201] Federally Enforceable Through Title V Permit
4. Wells may be operated with closed casing vents or be vented to vapor control system. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Fluids produced from wells with closed vents shall be introduced only to production equipment served by vapor control system listed on tank S-1326-46 which is 99% efficient. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

*COPY*

Arnaud Marjollet, Director of Permit Services

S-1326-26-22 : Nov 12 2014 1:50PM - RINALDIR : Joint Inspection NOT Required

6. The crude oil production from wells associated with this permit unit shall not lie within 1000 feet of an air injection well used for in-situ combustion. [District Rule 4407, 2.0, 3.4, and 3.5] Federally Enforceable Through Title V Permit
7. During the time any steam-enhanced crude oil production well is undergoing service or repair while the well is not producing, it shall be exempt from the emission control requirements of District Rule 4401, 5.0 (as amended January 15, 1998). [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit
8. All required source testing shall conform to the compliance testing procedures described in District Rule 1081(as amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit
9. The operator shall maintain monitoring records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401, 6.1] Federally Enforceable Through Title V Permit
10. The uncontrolled VOC emissions from any well vent shall be reduced by at least 99 percent by weight or, if several steam-enhanced crude oil production well vents are connected to a vapor collection and control system, total uncontrolled VOC emissions shall be reduced by at least 99 percent. This requirement does not apply to cyclic wells located on contiguous and adjacent oil production properties with less than 10 cyclic wells owned by or under the control of a company. [District Rule 4401, 5.1 and 5.2] Federally Enforceable Through Title V Permit
11. For cyclic wells located on properties with less than 10 cyclic wells and owned by a company, the uncontrolled VOC emissions from any well vent or system of well vents connected to a single control device shall be reduced by at least 50 percent. Properties shall include contiguous and adjacent oil production properties owned by or under control of the company. [District Rule 4401, 5.4] Federally Enforceable Through Title V Permit
12. Total number of leaks from the vapor collection and control system, including condensate handling, shall not exceed the number as allowed by Rule 4401 (as amended January 15, 1998) at any one time. [District Rule 4401, 5.3] Federally Enforceable Through Title V Permit
13. Operator shall affix a readily visible tag bearing the date on which a leak is detected. The tag shall remain in place until the leaking component is repaired. [District Rule 4401, 5.3.1] Federally Enforceable Through Title V Permit
14. Operator shall repair each leak within 15 days of detection. The APCO may grant a 10 day extension if the operator demonstrates that the necessary and sufficient actions have and are being taken to correct the leak. [District Rule 4401, 5.3.1] Federally Enforceable Through Title V Permit
15. Operator shall maintain all components of a well vent vapor collection and control system in good repair. Components of the well vent vapor collection and control system shall include all piping, valves, fittings, pumps, compressors, tanks, etc. used to collect, control, store, or dispose of VOC condensate or non-condensable VOCs and which is prior to any blending of VOC condensate with crude oil or blending of non-condensable VOCs with gases to be used as a fuel. [District Rule 4401, 5.3 and 5.3.2] Federally Enforceable Through Title V Permit
16. Annual control efficiency compliance tests shall be performed on all vapor collection and control systems used to control emissions from steam-enhanced crude oil production wells. Testing shall be performed by source tester certified by the California Air Resource Board (CARB) certified contractors during June, July, August or September of each year if the system's control efficiency is dependent upon ambient air temperature. The APCO may waive the requirements of this condition if the vapor control system does not exhaust to atmosphere or if all uncondensed VOC emissions collected by a vapor collection and control system are burned in fuel burning equipment or in a smokeless open flare and the source's Operating Permit contains adequate periodic monitoring to ensure the source meets 99% control efficiency. [District Rule 4401, 5.1, 5.2 and 6.2.1] Federally Enforceable Through Title V Permit
17. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule District Rule 4401, 6.3.1] Federally Enforceable Through Title V Permit
18. The permittee shall perform leak inspections at least annually, using a portable hydrocarbon detection instrument in accordance with USEPA Method 21. [District Rules 2520, 9.3.2 and 4401, 6.3.3] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

19. Compliance with permit conditions in the Title V permit shall be deemed compliance with Kern County Rule 108.1. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
20. Compliance with permit conditions in the Title V permit shall be deemed compliance with SJVUAPCD Rule 4401 (Amended January 15, 1998), excluding sections 5.1 and 5.2 for control systems which have been waived from complying with the requirement of section 6.2.1. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
21. The requirements of SJVUAPCD Rule 4407 (Adopted May 19, 1994) do not apply to this permit unit. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
22. Permittee shall maintain with the permit a current listing of all steam enhanced wells connected to the casing vent control system and shall make such listing readily available for District inspection upon request. [District Rule 4401] Federally Enforceable Through Title V Permit
23. Sulfur content of scrubbed TEOR gas and flare pilot gas shall not exceed 1 gr/100scf. [District Rule 2201] Federally Enforceable Through Title V Permit
24. The well vent vapors and tank vapors from vapor collection systems #S-1326-46 shall vent only to existing otherwise permit exempt combustion equipment, DOGGR approved injection wells, 2.9 MMBtu/hr waste gas flare, or steam generators S-1326-9, '-294, '-314, '-337, '-338, '-385, '-390, '-391, '-392, '-400, '-401, and '-419 through '-425. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Flare shall be used exclusively for incineration of vapors from this TEOR control system and tank vapor control systems #S-1326-46. [District Rule 2201] Federally Enforceable Through Title V Permit
26. Collected liquids shall be piped only to vapor controlled tanks. [District Rule 2201] Federally Enforceable Through Title V Permit
27. VOC content of well vent vapor gas shall not exceed 10% by weight. If the VOC content of the well vent vapor gas is less than 10% by weight for 8 consecutive quarterly samplings per District approved plan, sampling frequency shall only be required annually. Representative samples shall be collected during periods of normal operation and not be within 48 hours after routine maintenance or repair. Records of test shall be maintained for a period of five years and be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
28. The VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 or the latest revision of ASTM Method E168, E169 or E260 for liquids. [District Rule 4401, 6.3.5] Federally Enforceable Through Title V Permit
29. Emissions rates shall not exceed any of the following: VOC: 0.063 lb/MMBtu; NOx: 0.068 lb/MMBtu; PM10: 0.008 lb/MMBtu; and CO: 0.37 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
30. The higher heating value of the flared gas shall be monitored at least quarterly. Measured higher heating value and quantity of gas flared shall be used to determine compliance with heat input limits. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
31. Permittee shall test annually the sulfur content of casing gas combusted in permit exempt equipment using ASTM method D1072, D3031, D4084, or D3246 and make test results readily available for District inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
32. The flare shall be operated according to the manufacturer's specifications, a copy of which shall be maintained on site. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
33. If this flare requires a pilot flame, then the flare shall be operated with a flame present at all times, and kept in operation when emissions may be vented to it. The presence of a flare pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

34. Permittee shall maintain daily records of pilot gas and TEOR gas flared and shall make such records readily available for District inspection for a period of five years. [District Rule 2520, 9.4.2 and District Rule 1070] Federally Enforceable Through Title V Permit
35. This flare shall be inspected every two weeks while in operation for visible emissions. If visible emissions are observed, corrective action shall be taken. If visible emissions continue, an EPA Method 9 test shall be conducted within 72 hours. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
36. This flare shall not be used as a leak control device as described in Rule 4403, 5.3.1, nor as a control device for any permit unit subject to NSPS, without modification of permit requirements to address 40 CFR 60.18. [District Rule 2520, 9.3.3] Federally Enforceable Through Title V Permit
37. Sulfa Treat equipment shall be purged with natural gas, inert gas, or air prior to opening any vessel, filter, pipeline or connection to prevent sulfur compound emissions. [District Rule 2201] Federally Enforceable Through Title V Permit



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-1326-27-19

**ISSUANCE DATE:** 03/20/2014

**LEGAL OWNER OR OPERATOR:** VINTAGE PRODUCTION CALIFORNIA LLC

**MAILING ADDRESS:** 9600 MING AVE, SUITE 300  
BAKERSFIELD, CA 93311

**LOCATION:** HEAVY OIL CENTRAL STATIONARY SOURCE  
KERN COUNTY, CA

**SECTION:** 02 **TOWNSHIP:** 28S **RANGE:** 27E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF THERMALLY ENHANCED OIL RECOVERY (TEOR) OPERATION WITH WELL VENT VAPOR CONTROL SYSTEM SERVING UP TO 100 STEAM ENHANCED WELLS INCLUDING: GAS LIQUID SEPERATORS, COMPRESSOR, CONDENSATE HANDLING AND 2.9 MMBTU/HR AIR ASSISTED FLARE (SECTION 2 EAST CVR); ADD STEAM GENERATORS S-1326-419 THROUGH '-425 AS GAS DISPOSAL DEVICES

## CONDITIONS

1. Authority to Construct (ATC) S-1326-27-18 shall be implemented prior to or concurrently with this ATC. [District Rule 2201]
2. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
3. Wells may be operated with closed casing vents or be vented to vapor control system. [District Rule 2201] Federally Enforceable Through Title V Permit
4. TEOR operation (Section 2 East CVR) shall include gas liquid separator, compressor, condensate handling equipment, 2.9 MMBtu/hr McGill, #1011-2, flare equipped with 2 in. dia. burner tip, 1/2 hp air assist blower, and K/O drum at flare base and vapor piping from TEOR system S-1326-28 . [District Rule 2201] Federally Enforceable Through Title V Permit
5. The well vent vapors shall vent only to 2.9 MMBtu/hr waste gas flare or steam generators S-1326-9, '-294, '-314, '-337, '-338, '-385, '-390, '-391, '-392, '-400, '-401, and '-419 through '-425. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

*COPY*  
Arnaud Marjollet, Director of Permit Services

S-1326-27-19 : Nov 12 2014 1:58PM -- RINALDIR : Joint Inspection NOT Required

6. Fluids produced from wells with closed vents shall be introduced only to production equipment served by vapor control system listed on tank S-1326-201 which is 99% efficient. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The crude oil production from wells associated with this permit unit shall not lie within 1000 feet of an air injection well used for in-situ combustion. [District Rule 4407, 2.0, 3.4, and 3.5] Federally Enforceable Through Title V Permit
8. During the time any steam-enhanced crude oil production well is undergoing service or repair while the well is not producing, it shall be exempt from the emission control requirements of District Rule 4401, 5.0 (as amended January 15, 1998). [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit
9. All required source testing shall conform to the compliance testing procedures described in District Rule 1081(as amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit
10. The operator shall maintain monitoring records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401, 6.1] Federally Enforceable Through Title V Permit
11. The uncontrolled VOC emissions from any well vent shall be reduced by at least 99 percent by weight or, if several steam-enhanced crude oil production well vents are connected to a vapor collection and control system, total uncontrolled VOC emissions shall be reduced by at least 99 percent. This requirement does not apply to cyclic wells located on contiguous and adjacent oil production properties with less than 10 cyclic wells owned by or under the control of a company. [District Rule 4401, 5.1 and 5.2] Federally Enforceable Through Title V Permit
12. For cyclic wells located on properties with less than 10 cyclic wells and owned by a company, the uncontrolled VOC emissions from any well vent or system of well vents connected to a single control device shall be reduced by at least 50 percent. Properties shall include contiguous and adjacent oil production properties owned by or under control of the company. [District Rule 4401, 5.4] Federally Enforceable Through Title V Permit
13. Total number of leaks from the vapor collection and control system, including condensate handling, shall not exceed the number as allowed by Rule 4401 (as amended January 15, 1998) at any one time. [District Rule 4401, 5.3] Federally Enforceable Through Title V Permit
14. Operator shall affix a readily visible tag bearing the date on which a leak is detected. The tag shall remain in place until the leaking component is repaired. [District Rule 4401, 5.3.1] Federally Enforceable Through Title V Permit
15. Operator shall repair each leak within 15 days of detection. The APCO may grant a 10 day extension if the operator demonstrates that the necessary and sufficient actions have and are being taken to correct the leak. [District Rule 4401, 5.3.1] Federally Enforceable Through Title V Permit
16. Operator shall maintain all components of a well vent vapor collection and control system in good repair. Components of the well vent vapor collection and control system shall include all piping, valves, fittings, pumps, compressors, tanks, etc. used to collect, control, store, or dispose of VOC condensate or non-condensable VOCs and which is prior to any blending of VOC condensate with crude oil or blending of non-condensable VOCs with gases to be used as a fuel. [District Rule 4401, 5.3 and 5.3.2] Federally Enforceable Through Title V Permit
17. Annual control efficiency compliance tests shall be performed on all vapor collection and control systems used to control emissions from steam-enhanced crude oil production wells. Testing shall be performed by source tester certified by the California Air Resource Board (CARB) certified contractors during June, July, August or September of each year if the system's control efficiency is dependent upon ambient air temperature. The APCO may waive the requirements of this condition if the vapor control system does not exhaust to atmosphere or if all uncondensed VOC emissions collected by a vapor collection and control system are burned in fuel burning equipment or in a smokeless open flare and the source's Operating Permit contains adequate periodic monitoring to ensure the source meets 99% control efficiency. [District Rule 4401, 5.1, 5.2 and 6.2.1] Federally Enforceable Through Title V Permit
18. The control efficiency, measured and calculated as carbon ,of the vapor collection and control system used to control VOC emissions from steam enhanced crude oil production well shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound. [District Rule 4401, 6.3.1] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

19. The source shall perform leak inspections at least annually, using a portable hydrocarbon detection instrument in accordance with USEPA Method 21. [District Rules 2520, 9.3.2 and 4401, 6.3.3] Federally Enforceable Through Title V Permit
20. Permittee shall maintain with the permit a current listing of all steam enhanced wells connected to the casing vent control system and shall make such listing readily available for District inspection upon request. [District Rule 4401, 6.6] Federally Enforceable Through Title V Permit
21. Compliance with permit conditions in the Title V permit shall be deemed compliance with Kern County Rule 108.1. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
22. Compliance with permit conditions in the Title V permit shall be deemed compliance with SJVUAPCD Rule 4401 (Amended January 15, 1998), excluding sections 5.1 and 5.2 for control systems which have been waived from complying with the requirement of section 6.2.1. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
23. The requirements of District Rule 4407 (Adopted May 19, 1994) do not apply to this permit unit because it is not an in situ combustion well vent. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
24. Flare Visible emissions shall not exceed 1/4 Ringelmann. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Sulfur content of scrubbed TEOR gas and flare pilot gas shall not exceed 1 gr/100scf. [District Rule 2201] Federally Enforceable Through Title V Permit
26. All well vent gas shall be scrubbed prior to incineration in 2.9 MMBtu/hr waste gas flare or steam generators S-1326-9, '-294, '-314, '-337, '-338, '-385, '-390, '-391, '-392, '-400, '-401, and '-419 through '-425. [District Rule 2201] Federally Enforceable Through Title V Permit
27. Emission rates for flare shall not exceed any of the following limits: 0.008 lb-PM10/MMBtu, 0.068 lb-NOx/MMBtu (as NO2), 0.063 lb-VOC/MMBtu, or 0.37 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
28. The higher heating value of the flared gas shall be monitored at least quarterly. Measured higher heating value and quantity of gas flared shall be used to determine compliance with heat input limits. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
29. VOC content of well vent vapor gas shall not exceed 10% by weight. If the VOC content of the well vent vapor gas is less than 10% by weight for 8 consecutive quarterly samplings per District approved plan, sampling frequency shall only be required annually. Representative samples shall be collected during periods of normal operation and not be within 48 hours after routine maintenance or repair. Records of test shall be maintained for a period of five years and be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
30. The VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 or the latest revision of ASTM Method E168, E169 or E260 for liquids. [District Rule 4401, 6.3.5] Federally Enforceable Through Title V Permit
31. Permittee shall test annually the sulfur content of scrubbed casing gas using ASTM method D1072, D3031, D4084, or D3246 and make test results readily available for District inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
32. Permittee shall maintain a current well roster and shall make such roster, component count and resulting emissions readily available for District inspection upon request. [District Rule 1070]
33. Condensed liquids from condensate handling system shall be piped in closed systems to the WASP disposal well. [District Rule 2201] Federally Enforceable Through Title V Permit
34. Emergency condensate overflow pit shall be empty except during breakdown conditions pursuant to Rule 1100. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE



35. All wells served by this vapor control system shall be shut-in and shall not vent to the atmosphere in the event of failure of the non-condensable VOC disposal system. [District Rule 2201] Federally Enforceable Through Title V Permit
36. Permittee shall at least monthly, measure and record sulfur content and BTU content of TEOR gas exiting the desulfurizer using ASTM method D1072, D3031, D4084, D3246 or a gas detector tube, and shall make all records and analyses readily available for District inspection. [District Rule 2201 and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
37. Permittee shall maintain daily records of pilot gas and TEOR gas flared and shall make such records readily available for District inspection for a period of five years. [District Rule 2520, 9.4.2 and District Rule 1070] Federally Enforceable Through Title V Permit
38. The flare shall be operated according to the manufacturer's specifications, a copy of which shall be maintained on site. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
39. If this flare requires a pilot flame, then the flare shall be operated with a flame present at all times, and kept in operation when emissions may be vented to it. The presence of a flare pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
40. This flare shall be inspected every two weeks while in operation for visible emissions. If visible emissions are observed, corrective action shall be taken. If visible emissions continue, an EPA Method 9 test shall be conducted within 72 hours. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
41. This flare shall not be used as a leak control device as described in Rule 4403, 5.3.1, nor as a control device for any permit unit subject to NSPS, without modification of permit requirements to address 40 CFR 60.18. [District Rule 2520, 9.3.3] Federally Enforceable Through Title V Permit



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-1326-28-18

**ISSUANCE DATE:** 03/20/2014

**LEGAL OWNER OR OPERATOR:** VINTAGE PRODUCTION CALIFORNIA LLC

**MAILING ADDRESS:** 9600 MING AVE, SUITE 300  
BAKERSFIELD, CA 93311

**LOCATION:** HEAVY OIL CENTRAL STATIONARY SOURCE  
KERN COUNTY, CA

**SECTION: 2 TOWNSHIP: 28S RANGE: 27E**

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF THERMALLY ENHANCED OIL RECOVERY OPERATION INCLUDING DEEP EMERGENCY OVERFLOW PIT WITH MESH COVER, HORIZONTAL GAS LIQUID SEPARATOR, AIR-COOLED HEAT EXCHANGER, HORIZONTAL CONDENSATE COLLECTION VESSEL WITH LIQUID TRANSFER PUMPS, 30 HP COMPRESSOR (K-101), 2.9 MMBTU/HR MCGILL STANDBY FLARE (#1011-2) EQUIPPED WITH 2 IN DIA BURNER TIP, AIR ASSIST BLOWER, KO DRUM SHARED WITH PERMIT UNIT S-1326-27, AND WELL VENT VAPOR CONTROL SYSTEM SERVING 150 STEAM DRIVE WELLS: ADD STEAM GENERATORS S-1326-419 THROUGH '-425 AS GAS DISPOSAL DEVICES

## CONDITIONS

1. Authority to Construct (ATC) S-1326-28-17 shall be implemented prior to or concurrently with this ATC. [District Rule 2201]
2. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
3. TEOR operation shall include deep emergency overflow pit with mesh cover, horizontal gas-liquid separator, air-cooled heat exchanger, horizontal condensate collection vessel with liquid transfer pumps for the pumping of condensate to heavy oil tank battery, 30 hp compressor (K-101) with compressed vapors sent to common field fuel gas line, and production well vent casing line to TEOR system S-1326-27 and steam generators S-1326-9, '-294, '-314, '-337, '-338, '-385, '-390, '-391, '-392, '-400, '-401, and '-419 through '-425. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Wells may be operated with closed casing vents or be vented to vapor control system. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

*COPY*

Arnaud Marjollet, Director of Permit Services

S-1326-28-18 : Nov 12 2014 2:23PM - RINALDIR : Joint Inspection NOT Required

5. Fluids produced from wells with closed vents shall be introduced only to production equipment served by vapor control system listed on tank S-1326-201 which is 99% efficient. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The crude oil production from wells associated with this permit unit shall not lie within 1000 feet of an air injection well used for in-situ combustion. [District Rule 4407, 2.0, 3.4, and 3.5] Federally Enforceable Through Title V Permit
7. During the time any steam-enhanced crude oil production well is undergoing service or repair while the well is not producing, it shall be exempt from the emission control requirements of District Rule 4401, 5.0 (as amended January 15, 1998). [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit
8. All required source testing shall conform to the compliance testing procedures described in District Rule 1081(as amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit
9. The operator shall maintain monitoring records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401, 6.1] Federally Enforceable Through Title V Permit
10. The uncontrolled VOC emissions from any well vent shall be reduced by at least 99 percent by weight or, if several steam-enhanced crude oil production well vents are connected to a vapor collection and control system, total uncontrolled VOC emissions shall be reduced by at least 99 percent. This requirement does not apply to cyclic wells located on contiguous and adjacent oil production properties with less than 10 cyclic wells owned by or under the control of a company. [District Rule 4401, 5.1 and 5.2] Federally Enforceable Through Title V Permit
11. For cyclic wells located on properties with less than 10 cyclic wells and owned by a company, the uncontrolled VOC emissions from any well vent or system of well vents connected to a single control device shall be reduced by at least 50 percent. Properties shall include contiguous and adjacent oil production properties owned by or under control of the company. [District Rule 4401, 5.4] Federally Enforceable Through Title V Permit
12. Total number of leaks from the vapor collection and control system, including condensate handling, shall not exceed the number as allowed by Rule 4401 (as amended January 15, 1998) at any one time. [District Rule 4401, 5.3] Federally Enforceable Through Title V Permit
13. Operator shall affix a readily visible tag bearing the date on which a leak is detected. The tag shall remain in place until the leaking component is repaired. [District Rule 4401, 5.3.1] Federally Enforceable Through Title V Permit
14. Operator shall repair each leak within 15 days of detection. The APCO may grant a 10 day extension if the operator demonstrates that the necessary and sufficient actions have and are being taken to correct the leak. [District Rule 4401, 5.3.1] Federally Enforceable Through Title V Permit
15. Operator shall maintain all components of a well vent vapor collection and control system in good repair. Components of the well vent vapor collection and control system shall include all piping, valves, fittings, pumps, compressors, tanks, etc. used to collect, control, store, or dispose of VOC condensate or non-condensable VOCs and which is prior to any blending of VOC condensate with crude oil or blending of non-condensable VOCs with gases to be used as a fuel. [District Rule 4401, 5.3 and 5.3.2] Federally Enforceable Through Title V Permit
16. Annual control efficiency compliance tests shall be performed on all vapor collection and control systems used to control emissions from steam-enhanced crude oil production wells. Testing shall be performed by source tester certified by the California Air Resource Board (CARB) certified contractors during June, July, August or September of each year if the system's control efficiency is dependent upon ambient air temperature. The APCO may waive the requirements of this condition if the vapor control system does not exhaust to atmosphere or if all uncondensed VOC emissions collected by a vapor collection and control system are burned in fuel burning equipment or in a smokeless open flare and the source's Operating Permit contains adequate periodic monitoring to ensure the source meets 99% control efficiency. [District Rule 4401, 5.1, 5.2 and 6.2.1] Federally Enforceable Through Title V Permit
17. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule District Rule 4401, 6.3.1] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

18. The permittee shall perform leak inspections at least annually, using a portable hydrocarbon detection instrument in accordance with USEPA Method 21. [District Rules 2520, 9.3.2 and 4401, 6.3.3] Federally Enforceable Through Title V Permit
19. Compliance with permit conditions in the Title V permit shall be deemed compliance with Kern County Rule 108.1. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
20. Compliance with permit conditions in the Title V permit shall be deemed compliance with SJVUAPCD Rule 4401 (Amended January 15, 1998), excluding sections 5.1 and 5.2 for control systems which have been waived from complying with the requirement of section 6.2.1. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
21. The requirements of District Rule 4407 (Adopted May 19, 1994) do not apply to this permit unit because it is not an in situ combustion well vent. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
22. Components shall be maintained and leaks shall be repaired as specified in Rule 4401. [District Rule 2201] Federally Enforceable Through Title V Permit
23. The VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 or the latest revision of ASTM Method E168, E169 or E260 for liquids. [District Rule 4401, 6.3.5] Federally Enforceable Through Title V Permit
24. Permittee shall maintain with the permit a current listing of all steam enhanced wells connected to the casing vent control system and shall make such listing readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Well vent vapor control system shall include vapor piping connected to tank vapor control system listed on permit #S-1326-201. [District Rule 2201] Federally Enforceable Through Title V Permit
26. Sulfur content of scrubbed TEOR gas shall not exceed 1 gr/100scf. [District Rule 2201] Federally Enforceable Through Title V Permit
27. Sulfur scrubber shall be operated to maintain continued compliance with fuel gas sulfur content limit of 1 grain-S/100 scf of fuel gas. [District Rule 2201] Federally Enforceable Through Title V Permit
28. Only PUC quality natural gas or comparable quality lease gas with sulfur content of 1 grain-S/100 scf or less shall be utilized as make-up gas for the horizontal condensate collection vessel and utilized as pilot fuel for standby flare. [District Rule 2201] Federally Enforceable Through Title V Permit
29. Sulfur scrubber shall be monitored monthly for H<sub>2</sub>S content of gas after treatment to determine when recharging is required. [District Rule 2201] Federally Enforceable Through Title V Permit
30. Permittee shall maintain a written record of H<sub>2</sub>S content and recharging dates and such records shall be made readily available for District inspection upon request. [District NSR Rule and District Rule 1070] Federally Enforceable Through Title V Permit
31. Permittee shall test annually the sulfur content of scrubbed casing gas using ASTM method D1072, D3031, D4084, or D3246 and make test results readily available for District inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
32. VOC content of well vent vapor gas shall not exceed 10% by weight. If the VOC content of the well vent vapor gas is less than 10% by weight for 8 consecutive quarterly samplings per District approved plan, sampling frequency shall only be required annually. Representative samples shall be collected during periods of normal operation and not be within 48 hours after routine maintenance or repair. Records of test shall be maintained for a period of five years and be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
33. The emergency condensate overflow pit shall be empty except during breakdown conditions pursuant to Rule 1100. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

34. Well head casing vent gas collection system shall be shut-in and shall not vent to the atmosphere in the event of failure of the non-condensable VOC disposal system. [District Rule 2201] Federally Enforceable Through Title V Permit



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-1326-35-15

**ISSUANCE DATE:** 03/20/2014

**LEGAL OWNER OR OPERATOR:** VINTAGE PRODUCTION CALIFORNIA LLC

**MAILING ADDRESS:** 9600 MING AVE, SUITE 300  
BAKERSFIELD, CA 93311

**LOCATION:** HEAVY OIL CENTRAL STATIONARY SOURCE  
KERN COUNTY, CA

**SECTION:** 14 **TOWNSHIP:** 28S **RANGE:** 27E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF THERMALLY ENHANCED OIL RECOVERY OPERATION WITH WELL VENT VAPOR CONTROL SYSTEM SERVING 250 STEAM ENHANCED WELLS, INCLUDING 50 HP COMPRESSOR, ONE AIR-COOLED VAPOR CONDENSER, AND PIPING TO FIELD FUEL GAS SYSTEM, DOGGR DISPOSAL WELL, AND/OR 3.6 MMBTU/HR KALDAIR FLARE INCLUDING TWO 8000 LB SULFATREAT CANISTERS (ONE AS BACKUP) (SECTION 14 YOUNG); ADD STEAM GENERATORS S-1326-419 THROUGH '-425 AS GAS DISPOSAL DEVICES

## CONDITIONS

1. Authority to Construct (ATC) S-1326-35-14 shall be implemented prior to or concurrently with this ATC. [District Rule 2201]
2. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
3. Fluids produced from wells with closed vents shall be introduced only to production equipment served by vapor control system listed on tank S-1326-201 which is 99% efficient. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Well vent vapors shall vent to the field fuel gas system, DOGGR approved injection wells, flare listed on this permit, or steam generators S-1326-9, '-294, '-314, '-337, '-338, '-385, '-390, '-391, '-392, '-400, '-401, and '-419 through '-425. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Well head casing vent collection piping network shall be limited to 250 steam enhanced wells. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO

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Arnaud Marjollet, Director of Permit Services

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6. Sulfur scrubber shall be monitored monthly for H<sub>2</sub>S content of gas after treatment to determine when recharging is required. [District NSR Rule and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
7. Sulfur content of gas combusted in flare shall not exceed 1 gr/100 scf. [District NSR Rule, District Rule 4801, and Kern County Rule 407] Federally Enforceable Through Title V Permit
8. Permittee shall test annually the sulfur content of gas combusted in flare using ASTM method D1072, D3031, D4084, or D3246 and make test results readily available for District inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
9. Flare shall operate with no visible emission in excess of 5% opacity. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Maximum amount of gas (pilot and waste gas) combusted by flare shall not exceed 150.0 MMBtu/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Emissions from the flare shall not exceed any of the following limits (based on total gas combusted): NO<sub>x</sub> (as NO<sub>2</sub>): 0.068 lb/MMBtu; PM<sub>10</sub>: 0.008 lb/MMBtu; CO: 0.37 lb/MMBtu; or VOC: 0.063 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The higher heating value of the flared gas shall be monitored at least quarterly. Measured higher heating value and quantity of gas flared shall be used to determine compliance with heat input limit. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
13. The flare shall be operated according to the manufacturer's specifications, a copy of which shall be maintained on site. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. If this flare requires a pilot flame, then the flare shall be operated with a flame present at all times, and kept in operation when emissions may be vented to it. The presence of a flare pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. This flare shall be inspected every two weeks while in operation for visible emissions. If visible emissions are observed, corrective action shall be taken. If visible emissions continue, an EPA Method 9 test shall be conducted within 72 hours. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. This flare shall not be used as a leak control device as described in Rule 4403, 5.3.1, nor as a control device for any permit unit subject to NSPS, without modification of permit requirements to address 40 CFR 60.18. [District Rule 2520, 9.3.3] Federally Enforceable Through Title V Permit
17. A gas leak is defined as the detection of a concentration of total organic compounds, above background (measured in accordance with EPA Method 21) that exceeds the following values: 1) A major gas leak is a detection of greater than 10,000 ppmv as methane; and 2) A minor gas leak is a detection of 400 to 10,000 ppmv as methane for pressure relief devices (PRDs) and 2,000 to 10,000 for components other than PRDs. [District Rule 4401] Federally Enforceable Through Title V Permit
18. A liquid leak is defined as the dripping of VOC-containing liquid. A major liquid leak is a visible mist or a continuous flow of liquid that is not seal lubricant. A minor liquid leak is a liquid leak that is not a major liquid leak and drips liquid at a rate of more than three drops per minute, except for seal lubricant. [District Rule 4401] Federally Enforceable Through Title V Permit
19. During the time any steam-enhanced crude oil production well is undergoing service or repair while the well is not producing, it shall be exempt from the emission control requirements of District Rule 4401, 5.0 (as amended December 14, 2006). [District Rule 4401] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

20. The following conditions shall be used to determination of a violation: 1) Existence of an open-ended line or a valve located at the end of the line that is not sealed with a blind flange, plug, cap, or a second closed valve that is not closed at all times, except during attended operations requiring process fluid flow through the open-ended lines. Attended operations include draining or degassing operations, connection of temporary process equipment, sampling of process streams, emergency venting, and other normal operational needs, provided such operations are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere; 2) Existence of a component with a major liquid leak; 3) Existence of a component with a gas leak greater than 50,000 ppmv; or 4) Existence of a component leak consisting of a minor liquid or gas leak, or a gas leak greater than 10,000 ppmv up to 50,000 ppmv, in excess of the allowable number of leaks specified in Table 3 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
21. Total number of leaks from the vapor collection and control system, including condensate handling, shall not exceed the number as allowed by Rule 4401 (as amended December 14, 2006) at any one time. [District Rule 4401] Federally Enforceable Through Title V Permit
22. Operator shall affix a readily visible tag bearing the date and time of leak detection, the date and time of leak measurement, the leak concentration of gaseous leaks (in ppmv), for liquid leaks whether it is a major liquid leak or a minor liquid leak, and whether the component is an essential component, an unsafe-to monitor component, or a critical component leak. [District Rule 4401] Federally Enforceable Through Title V Permit
23. The tag shall remain in place until the leaking component is repaired, re-inspected, using the test method in Section 6.3.3, and the component is found to be in compliance with the requirements of this rule. [District Rule 4401] Federally Enforceable Through Title V Permit
24. An operator shall minimize a component leak in order to stop or reduce leakage to the atmosphere immediately to the extent possible, but not later than one (1) hour after detection of the leak. [District Rule 4401] Federally Enforceable Through Title V Permit
25. Except for leaking critical components or leaking essential components, the operator shall repair each leak within time specified in Table 3, of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
26. If the leaking component is an essential component or a critical component that cannot be immediately shut down for repairs, and if the leak has been minimized but the leak still exceeds the applicable leak standard of this rule, the operator shall repair or replace the essential component or critical component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4401] Federally Enforceable Through Title V Permit
27. The operator shall not use any components that leak in excess of the applicable leak standards as specified in this permit. Components that have been found leaking in excess of the applicable leak standards of this rule may be used provided such leaking components have been identified with a tag for repair, are repaired, or are awaiting re-inspection after being repaired, within the applicable time period specified in this permit. [District Rule 4401] Federally Enforceable Through Title V Permit
28. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401] Federally Enforceable Through Title V Permit
29. Except for pipes and unsafe-to-monitor components, an operator shall inspect all other components pursuant to the requirements of Section 6.3.3 at least once every year [District Rule 4401] Federally Enforceable Through Title V Permit
30. An operator shall visually inspect all pipes at least once every year. Any visual inspection of pipes that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected within 24 hours after detecting the leak. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 3 of this rule. [District Rule 4401] Federally Enforceable Through Title V Permit
31. An operator shall audio-visually (by hearing and by sight) inspect for leaks all accessible operating pumps, compressors, and PRDs in service at least once each calendar week. [District Rule 4401] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE



32. Any audio-visual inspection of an accessible operating pump, compressor, and PRD performed by an operator that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected not later than 24 hours after conducting the audio-visual inspection. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 3 of this rule. [District Rule 4401] Federally Enforceable Through Title V Permit
33. An operator shall initially inspect a PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the discovery of the release. An operator shall re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection. [District Rule 4401] Federally Enforceable Through Title V Permit
34. An operator shall inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service. [District Rule 4401] Federally Enforceable Through Title V Permit
35. An operator shall inspect a component, except for a PRD that releases to the atmosphere, that has been repaired or replaced not later than 15 calendar days after the component was repaired or replaced. [District Rule 4401] Federally Enforceable Through Title V Permit
36. An operator shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401] Federally Enforceable Through Title V Permit
37. The operator shall perform leak inspections at least annually, using a portable hydrocarbon detection instrument in accordance with USEPA Method 21. Where safety is a concern, such as measuring leaks from compressor seals or pump seals when the shaft is rotating, a person shall measure leaks by placing the instrument probe inlet at a distance of one centimeter or less from the surface of the component interface. [District Rule 4401] Federally Enforceable Through Title V Permit
38. VOC content of well vent vapor gas shall not exceed 10% by weight. If the VOC content of the well vent vapor gas is less than 10% by weight for 8 consecutive quarterly samplings per District approved plan, sampling frequency shall only be required annually. Representative samples shall be collected during periods of normal operation and not be within 48 hours after routine maintenance or repair. Records of test shall be maintained for a period of five years and be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
39. The VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 or the latest revision of ASTM Method E168, E169 or E260 for liquids. [District Rule 4401] Federally Enforceable Through Title V Permit
40. Annual control efficiency compliance tests shall be performed on all vapor collection and control systems used to control emissions from steam-enhanced crude oil production wells. Testing shall be performed by source tester certified by the California Air Resource Board (CARB) certified contractors during June, July, August or September of each year if the system's control efficiency is dependent upon ambient air temperature. The APCO may waive the requirements of this condition if the vapor control system does not exhaust to atmosphere or if all uncondensed VOC emissions collected by a vapor collection and control system are burned in fuel burning equipment or in a smokeless open flare and the source's Operating Permit contains adequate periodic monitoring to ensure the source meets 99% control efficiency. [District Rule 4401] Federally Enforceable Through Title V Permit
41. The control efficiency of the vapor collection and control system used to control VOC emissions from steam enhanced crude oil production well shall be determined by mass balance based on most stringent of a source test, USEPA approved emission factors, or Air Pollution (AP)-42 emission factors for components; and the efficiency of destruction devices determined by USEPA Method 25, 25a, or 25b as applicable. [District Rule 4401] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

42. Permittee shall maintain an inspection log which includes the following information: 1) the total number of components inspected and the total number and percentage of leaking components found by component type, 2) the location, type, and name or description of each leaking component and description of any unit where the leaking component is found, 3) the date and method of leak detection, 4) the size of the leak (in ppmv for gaseous leaks, and major or minor for liquid leaks), 5) the date the leaking component is repaired, replaced, or removed from service, 6) the identity and location of essential or critical components found leaking that cannot be repaired until the next regular process unit turnaround or not later than one year after leak detection, whichever comes later, 7) the methods used to minimize the leak from essential or critical components, 8) the date of re-inspection and the leak concentration (in ppmv) after the component is repaired or replaced, 9) the inspector's name, mailing address, and business telephone number, and 10) the date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401] Federally Enforceable Through Title V Permit
43. Records shall be maintained of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components. The records shall include a copy of the current calibration gas certification from the vendor of the calibration gas cylinder, the date of calibration, the concentration of calibration gas, the instrument reading of calibration gas before adjustment, the instrument reading of calibration gas after adjustment, the calibration gas expiration date, and the calibration gas cylinder pressure at the time of calibration. [District Rule 4401] Federally Enforceable Through Title V Permit
44. The operator shall keep source test records which demonstrate compliance with the control efficiency requirements of the VOC collection and control system. [District Rule 4401] Federally Enforceable Through Title V Permit
45. Permittee shall establish and implement an employee training program for inspecting and repairing components and recordkeeping procedures, as necessary. Permittee shall maintain at the facility the copies of the training records of the training program. [District Rule 4401] Federally Enforceable Through Title V Permit
46. By January 30 of each year, permittee shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved OMP. [District Rule 4401] Federally Enforceable Through Title V Permit
47. Permittee shall maintain a copy of the latest APCO-approved Operator Management Plan (OMP) at the facility and make it available to the APCO, ARB, and US EPA upon request. [District Rule 4401] Federally Enforceable Through Title V Permit
48. The operator shall maintain monitoring records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401, 6.1] Federally Enforceable Through Title V Permit
49. The permittee shall keep accurate records of the amount of gas (pilot and waste gas) flared, H<sub>2</sub>S content and recharging dates, for a period of five years, and shall make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
50. Permittee shall maintain a current well roster of all wells served by collection system, and such roster shall be made readily available for District inspection upon request. [District Rule 2520, 9.3.2 and District Rule 1070] Federally Enforceable Through Title V Permit
51. All records required by this permit shall be maintained and retained on-site for a minimum of five (5) years and made available for District, ARB, and EPA inspection upon request. [District Rules 2201 and 4401] Federally Enforceable Through Title V Permit

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1326-263-21

**EXPIRATION DATE:** 03/31/2016

**SECTION:** SW23 **TOWNSHIP:** 28S **RANGE:** 27E

## **EQUIPMENT DESCRIPTION:**

3,000 BBL FIXED ROOF WASH TANK SERVED BY TANK VAPOR CONTROL SYSTEM SHARED WITH CASING VENT RECOVERY (CVR) SYSTEM LISTED ON S-1326-287 AND CRUDE OIL STORAGE TANKS S-1326-263, -279, -280, -281, -283, -285, AND '-315 (SECTION 23 FACILITY)

## **PERMIT UNIT REQUIREMENTS**

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1. Collected TVR vapors shall be disposed of in a Department of Oil, Gas and Geothermal Resources (DOGGR) approved vapor disposal well, injected into the field fuel gas system and used in permit exempt equipment, or combusted in steam generators S-1326-9, '-294, '-314, '-337, '-338, '385, '-390, '-391, '-392, '-400, and '-401. [District Rules 2020 and 2201] Federally Enforceable Through Title V Permit
2. VOC content of tank vapor space and vapor control system piping and components shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Prior to injecting collected TVR (and S-1326-287 CVR) vapors into field fuel gas system, the collected vapors shall be treated by a hydrogen sulfide removal system which reduces the hydrogen sulfide concentration in the collected vapors by at least 95%. The sulfur content of the treated vapors may not exceed 1.0 grains S/ 100 scf gas. The treated TVR (and CVR) vapors injected into the field fuel gas line shall not be greater than five percent by weight hydrocarbons heavier than butane as determined by test method ASTM D-1945 or equivalent test method with prior District approval. [District Rules 2020 and 2201] Federally Enforceable Through Title V Permit
4. Operator shall ensure the vapor control system is functional and operating as designed at all times, except during periods of routine maintenance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
5. The tank shall be equipped with a vapor loss prevention system capable of collecting all VOC emissions and preventing their emissions to the atmosphere at an efficiency of at least 99% by weight. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
6. The true vapor pressure of the liquids stored in this tank shall not exceed 0.5 psia. [District Rules 4623, 4.4 and 2201] Federally Enforceable Through Title V Permit
7. Connections between this TVR system and the wellhead casing vent recovery (CVR) system listed on S-1326-287 shall be made upstream of the hydrogen sulfide removal system included in this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Permittee shall conduct tank cleaning and maintenance operations in accordance with District approved procedures as described in this permit. [District Rule 2080] Federally Enforceable Through Title V Permit
9. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2080] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. Prior to opening the tank to allow tank cleaning, one of the following procedures must be followed: 1) Prior to venting the tank to the atmosphere, operate the tank vapor recovery system/vapor control device for at least 24 hours such that it collects the tank vapors; or 2) use liquid displacement, conducted using a liquid with a TVP less than 0.5 psia, or conducted by floating the oil pad off a crude oil tank by restricting the outflow of water, such that 90% of the tank volume is displaced; or 3) Vent the tank to a vapor control device/vapor recovery system until the vapor concentration is less than 10% of the lower explosive limit (LEL) or 5,000 ppmv whichever is less; or 4) vent the tank to the vapor control system for a length of time determined by the following relationship:  $t = 2.3 V/Q$ , where  $t$  = time,  $V$  = tank volume (cubic feet), and  $Q$  = flow rate to the vapor control system as determined using appropriate engineering calculations. [District Rule 2080] Federally Enforceable Through Title V Permit
11. The tank shall be cleaned using one of the following methods: water, hot water, solvents with an initial boiling point of greater than 302 F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams VOC per liter or less. The tank sediment may be used for road mix as allowed by Section 6.17 of District Rule 2020. [District Rule 2080] Federally Enforceable Through Title V Permit
12. Steam cleaning shall be allowed only during December through March, or at locations where wastewater treatment facilities are limited. [District Rule 2080] Federally Enforceable Through Title V Permit
13. Prior to reintroducing crude oil/water to the tank, the tank shall be filled to the maximum possible level with water, the tank vapor control system shall be reactivated and pressure/relief valves closed, and the liquid level shall be adjusted as necessary. [District Rule 2080] Federally Enforceable Through Title V Permit
14. Within 48 hours after refilling the tank with crude oil/water, the pressure relief valve seats and hatch seals shall be inspected for leaks using EPA method 21 and the regular tank maintenance and inspection program shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
15. Permittee shall maintain records of each period of cleaning and maintenance when the tank is disconnected or isolated from the vapor control system. Records shall include the date that tank cleaning was initiated, the date tank cleaning was completed, the procedure used to vent tank vapors prior to opening, the method of tank cleaning used, and a description of internal and external tank repairs and maintenance performed. Such records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit
16. Operator shall conduct quarterly gas sampling after TVR compressor (prior to connection to any other vapor control system) and at either the first line tank or at any secondary tank which is heated above ambient temperature. If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
17. VOC content of gas shall be measured using ASTM D-1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rule 4623, 6.2.2] Federally Enforceable Through Title V Permit
19. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623, 6.2.2] Federally Enforceable Through Title V Permit
20. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623, 6.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

21. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623, 6.4] Federally Enforceable Through Title V Permit
22. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623, 6.3.6] Federally Enforceable Through Title V Permit
23. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623, 6.3.6] Federally Enforceable Through Title V Permit
24. The permittee shall keep accurate records of VOC content of vapors, liquids stored and true vapor pressure of such liquids for a period of 5 years and shall make such records available for District inspection upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
25. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1326-405-1

**EXPIRATION DATE:** 03/31/2016

**SECTION:** NE 23    **TOWNSHIP:** 28S    **RANGE:** 27E

**EQUIPMENT DESCRIPTION:**

85.0 MMBTU/HR NATURAL GAS -FIRED STEAM GENERATOR WITH NORTH AMERICAN 4231-85-GLE/X8701 GLE BURNER S/N SD857413-01 AND A FLUE GAS RECIRCULATION SYSTEM

## PERMIT UNIT REQUIREMENTS

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1. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
2. Steam generator shall be equipped with variable frequency drive electrical motors driving the blower and water pump and a convection section with at least 235 square feet of heat transfer surface area per MMBtu/hr of maximum rated heat input (verified by manufacturer) or a manufacturer's overall thermal efficiency rating of 88%. [Public Resources Code 21000-21177; California Environmental Quality Act and District Rule 2410] Federally Enforceable Through Title V Permit
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
6. The unit shall only be fired on PUC-quality natural gas with a maximum sulfur content of 1.0 gr S/100scf. [District Rules 2201 4801, and 4320] Federally Enforceable Through Title V Permit
7. Permittee shall test annually the sulfur content of the fuel gas combusted in steam generator using ASTM method D1072, D3031, D4084, or D3246 and make test results readily available for District inspection. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
8. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
9. Emission rates shall not exceed: PM10: 0.003 lb/MMBtu, VOC: 0.0055 lb/MMBtu, NOx (as NO2): 7 ppmvd NOx @ 3% O2, or CO: 10 ppmv @ 3% O2. [District Rules 2201, 4201, 4301, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
10. Source testing to measure NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

11. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate, no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
12. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
13. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
14. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
15. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5, 4306, 5.5.5, and 4320] Federally Enforceable Through Title V Permit
16. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19; CO (ppmv) - EPA Method 10 or ARB Method 100; Stack gas oxygen (O<sub>2</sub>) - EPA Method 3 or 3A or ARB Method 100; stack gas velocities - EPA Method 2; Stack gas moisture content - EPA Method 4; SOx - EPA Method 6C or 8 or ARB Method 100; fuel gas sulfur as H<sub>2</sub>S content - EPA Method 11 or 15; and fuel hhv (MMBtu) - ASTM D 1826 or D 1945 in conjunction with ASTM D 3588. [District Rule 1081, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
17. The permittee shall monitor and record the stack concentration of NOx, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
18. If either the NOx or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
19. All NOx, CO, and O<sub>2</sub> emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
20. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NOx and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

21. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 4320] Federally Enforceable Through Title V Permit
22. If the steam generator is not fired on PUC-regulated natural gas and compliance is achieved through fuel sulfur content limitations, then the sulfur content of the fuel shall be determined by testing sulfur content at a location after all fuel sources are combined prior to incineration, or by performing mass balance calculations based on monitoring the sulfur content and volume of each fuel source. The sulfur content of the fuel shall be determined using the test methods referenced in this permit. [District Rule 4320] Federally Enforceable Through Title V Permit
23. Permittee shall maintain records of fuel gas sulfur compound measurements. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
24. If the unit is fired on PUC-regulated natural gas, valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy the fuel sulfur content analysis, provided they establish the fuel sulfur concentration and higher heating value. [District Rule 4320] Federally Enforceable Through Title V Permit
25. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1326-406-1

**EXPIRATION DATE:** 03/31/2016

**SECTION:** NE 23    **TOWNSHIP:** 28S    **RANGE:** 27E

**EQUIPMENT DESCRIPTION:**

85.0 MMBTU/HR NATURAL GAS -FIRED STEAM GENERATOR WITH NORTH AMERICAN 4231-85-GLE/X8701 GLE BURNER AND A FLUE GAS RECIRCULATION SYSTEM

## PERMIT UNIT REQUIREMENTS

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1. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
2. Steam generator shall be equipped with variable frequency drive electrical motors driving the blower and water pump and a convection section with at least 235 square feet of heat transfer surface area per MMBtu/hr of maximum rated heat input (verified by manufacturer) or a manufacturer's overall thermal efficiency rating of 88%. [Public Resources Code 21000-21177; California Environmental Quality Act and District Rule 2410] Federally Enforceable Through Title V Permit
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
6. The unit shall only be fired on PUC-quality natural gas with a maximum sulfur content of 1.0 gr S/100scf. [District Rules 2201 4801, and 4320] Federally Enforceable Through Title V Permit
7. Permittee shall test annually the sulfur content of the fuel gas combusted in steam generator using ASTM method D1072, D3031, D4084, or D3246 and make test results readily available for District inspection. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
8. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
9. Emission rates shall not exceed: PM10: 0.003 lb/MMBtu, VOC: 0.0055 lb/MMBtu, NOx (as NO2): 7 ppmvd NOx @ 3% O2, or CO: 10 ppmv @ 3% O2. [District Rules 2201, 4201, 4301, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
10. Source testing to measure NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

11. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate, no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
12. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
13. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
14. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
15. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5, 4306, 5.5.5, and 4320] Federally Enforceable Through Title V Permit
16. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19; CO (ppmv) - EPA Method 10 or ARB Method 100; Stack gas oxygen (O2) - EPA Method 3 or 3A or ARB Method 100; stack gas velocities - EPA Method 2; Stack gas moisture content - EPA Method 4; SOx - EPA Method 6C or 8 or ARB Method 100; fuel gas sulfur as H2S content - EPA Method 11 or 15; and fuel hhv (MMBtu) - ASTM D 1826 or D 1945 in conjunction with ASTM D 3588. [District Rule 1081, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
17. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
18. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
19. All NOx, CO, and O2 emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
20. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

21. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 4320] Federally Enforceable Through Title V Permit
22. If the steam generator is not fired on PUC-regulated natural gas and compliance is achieved through fuel sulfur content limitations, then the sulfur content of the fuel shall be determined by testing sulfur content at a location after all fuel sources are combined prior to incineration, or by performing mass balance calculations based on monitoring the sulfur content and volume of each fuel source. The sulfur content of the fuel shall be determined using the test methods referenced in this permit. [District Rule 4320] Federally Enforceable Through Title V Permit
23. Permittee shall maintain records of fuel gas sulfur compound measurements. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
24. If the unit is fired on PUC-regulated natural gas, valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy the fuel sulfur content analysis, provided they establish the fuel sulfur concentration and higher heating value. [District Rule 4320] Federally Enforceable Through Title V Permit
25. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1326-407-1

**EXPIRATION DATE:** 03/31/2016

**SECTION:** NE 23    **TOWNSHIP:** 28S    **RANGE:** 27E

**EQUIPMENT DESCRIPTION:**

85.0 MMBTU/HR NATURAL GAS -FIRED STEAM GENERATOR WITH NORTH AMERICAN 4231-85-GLE/X8701 GLE BURNER S/N SD89244-04 AND A FLUE GAS RECIRCULATION SYSTEM

## PERMIT UNIT REQUIREMENTS

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1. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
2. Steam generator shall be equipped with variable frequency drive electrical motors driving the blower and water pump and a convection section with at least 235 square feet of heat transfer surface area per MMBtu/hr of maximum rated heat input (verified by manufacturer) or a manufacturer's overall thermal efficiency rating of 88%. [Public Resources Code 21000-21177: California Environmental Quality Act and District Rule 2410] Federally Enforceable Through Title V Permit
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
6. The unit shall only be fired on PUC-quality natural gas with a maximum sulfur content of 1.0 gr S/100scf. [District Rules 2201 4801, and 4320] Federally Enforceable Through Title V Permit
7. Permittee shall test annually the sulfur content of the fuel gas combusted in steam generator using ASTM method D1072, D3031, D4084, or D3246 and make test results readily available for District inspection. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
8. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
9. Emission rates shall not exceed: PM10: 0.003 lb/MMBtu, VOC: 0.0055 lb/MMBtu, NOx (as NO2): 7 ppmvd NOx @ 3% O2, or CO: 10 ppmv @ 3% O2. [District Rules 2201, 4201, 4301, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
10. Source testing to measure NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

11. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate, no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
12. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
13. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
14. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
15. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5, 4306, 5.5.5, and 4320] Federally Enforceable Through Title V Permit
16. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19; CO (ppmv) - EPA Method 10 or ARB Method 100; Stack gas oxygen (O<sub>2</sub>) - EPA Method 3 or 3A or ARB Method 100; stack gas velocities - EPA Method 2; Stack gas moisture content - EPA Method 4; SOx - EPA Method 6C or 8 or ARB Method 100; fuel gas sulfur as H<sub>2</sub>S content - EPA Method 11 or 15; and fuel hhv (MMBtu) - ASTM D 1826 or D 1945 in conjunction with ASTM D 3588. [District Rule 1081, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
17. The permittee shall monitor and record the stack concentration of NOx, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
18. If either the NOx or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
19. All NOx, CO, and O<sub>2</sub> emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
20. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NOx and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

21. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 4320] Federally Enforceable Through Title V Permit
22. If the steam generator is not fired on PUC-regulated natural gas and compliance is achieved through fuel sulfur content limitations, then the sulfur content of the fuel shall be determined by testing sulfur content at a location after all fuel sources are combined prior to incineration, or by performing mass balance calculations based on monitoring the sulfur content and volume of each fuel source. The sulfur content of the fuel shall be determined using the test methods referenced in this permit. [District Rule 4320] Federally Enforceable Through Title V Permit
23. Permittee shall maintain records of fuel gas sulfur compound measurements. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
24. If the unit is fired on PUC-regulated natural gas, valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy the fuel sulfur content analysis, provided they establish the fuel sulfur concentration and higher heating value. [District Rule 4320] Federally Enforceable Through Title V Permit
25. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-1326-417-1

**ISSUANCE DATE:** 04/23/2013

**LEGAL OWNER OR OPERATOR:** VINTAGE PRODUCTION CALIFORNIA LLC

**MAILING ADDRESS:** 9600 MING AVE, SUITE 300  
BAKERSFIELD, CA 93311

**LOCATION:** HEAVY OIL CENTRAL STATIONARY SOURCE  
KERN COUNTY, CA

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 85 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH NORTH AMERICAN 4231-85 GLE BURNER (OR EQUIVALENT) AND A FLUE GAS RECIRCULATION SYSTEM: ADD RULE 2410 CONDITIONS

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Authority to Construct (ATC) S-1326-417-0 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
5. Steam generator shall be equipped with variable frequency drive electrical motors driving the blower and water pump and a convection section with at least 235 square feet of heat transfer surface area per MMBtu/hr of maximum rated heat input (verified by manufacturer) or a manufacturer's overall thermal efficiency rating of 88%. [Public Resources Code 21000-21177: California Environmental Quality Act and District Rule 2410] Federally Enforceable Through Title V Permit
6. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Sayed Sadredin, Executive Director / APCO

7. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
9. The unit shall only be fired on PUC-quality natural gas with a maximum sulfur content of 1.0 gr S/100scf. [District Rules 2201 4801, and 4320] Federally Enforceable Through Title V Permit
10. Permittee shall test annually the sulfur content of the fuel gas combusted in steam generator using ASTM method D1072, D3031, D4084, or D3246 and make test results readily available for District inspection. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
11. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
12. Emission rates shall not exceed: PM10: 0.003 lb/MMBtu, VOC: 0.0055 lb/MMBtu, NOx (as NO2): 7 ppmvd NOx @ 3% O2, or CO: 25 ppmv @ 3% O2. [District Rules 2201, 4201, 4301, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
13. Source testing to measure NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
14. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate, no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
15. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
16. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
17. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
18. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5, 4306, 5.5.5, and 4320] Federally Enforceable Through Title V Permit
19. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19; CO (ppmv) - EPA Method 10 or ARB Method 100; Stack gas oxygen (O2) - EPA Method 3 or 3A or ARB Method 100; stack gas velocities - EPA Method 2; Stack gas moisture content - EPA Method 4; SOx - EPA Method 6C or 8 or ARB Method 100; fuel gas sulfur as H2S content - EPA Method 11 or 15; and fuel hhv (MMBtu) - ASTM D 1826 or D 1945 in conjunction with ASTM D 3588. [District Rule 1081, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
20. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE



21. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
22. All NO<sub>x</sub>, CO, and O<sub>2</sub> emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
23. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
24. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 4320] Federally Enforceable Through Title V Permit
25. If the steam generator is not fired on PUC-regulated natural gas and compliance is achieved through fuel sulfur content limitations, then the sulfur content of the fuel shall be determined by testing sulfur content at a location after all fuel sources are combined prior to incineration, or by performing mass balance calculations based on monitoring the sulfur content and volume of each fuel source. The sulfur content of the fuel shall be determined using the test methods referenced in this permit. [District Rule 4320] Federally Enforceable Through Title V Permit
26. Permittee shall maintain records of fuel gas sulfur compound measurements. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
27. If the unit is fired on PUC-regulated natural gas, valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy the fuel sulfur content analysis, provided they establish the fuel sulfur concentration and higher heating value. [District Rule 4320] Federally Enforceable Through Title V Permit
28. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-1326-418-1

**ISSUANCE DATE:** 04/23/2013

**LEGAL OWNER OR OPERATOR:** VINTAGE PRODUCTION CALIFORNIA LLC

**MAILING ADDRESS:** 9600 MING AVE, SUITE 300  
BAKERSFIELD, CA 93311

**LOCATION:** HEAVY OIL CENTRAL STATIONARY SOURCE  
KERN COUNTY, CA

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 85 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH NORTH AMERICAN 4231-85 GLE BURNER (OR EQUIVALENT) AND A FLUE GAS RECIRCULATION SYSTEM: ADD RULE 2410 CONDITIONS

### CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Authority to Construct (ATC) S-1326-418-0 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
5. Steam generator shall be equipped with variable frequency drive electrical motors driving the blower and water pump and a convection section with at least 235 square feet of heat transfer surface area per MMBtu/hr of maximum rated heat input (verified by manufacturer) or a manufacturer's overall thermal efficiency rating of 88%. [Public Resources Code 21000-21177: California Environmental Quality Act and District Rule 2410] Federally Enforceable Through Title V Permit
6. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

*COPY*

Arnaud Marjollet, Director of Permit Services

S-1326-418-1 : Nov 12 2014 1:22PM - RINALDIR : Joint Inspection NOT Required

7. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
9. The unit shall only be fired on PUC-quality natural gas with a maximum sulfur content of 1.0 gr S/100scf. [District Rules 2201 4801, and 4320] Federally Enforceable Through Title V Permit
10. Permittee shall test annually the sulfur content of the fuel gas combusted in steam generator using ASTM method D1072, D3031, D4084, or D3246 and make test results readily available for District inspection. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
11. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
12. Emission rates shall not exceed: PM10: 0.003 lb/MMBtu, VOC: 0.0055 lb/MMBtu, NOx (as NO2): 7 ppmvd NOx @ 3% O2, or CO: 25 ppmv @ 3% O2. [District Rules 2201, 4201, 4301, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
13. Source testing to measure NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
14. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate, no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
15. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
16. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
17. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
18. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5, 4306, 5.5.5, and 4320] Federally Enforceable Through Title V Permit
19. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19; CO (ppmv) - EPA Method 10 or ARB Method 100; Stack gas oxygen (O2) - EPA Method 3 or 3A or ARB Method 100; stack gas velocities - EPA Method 2; Stack gas moisture content - EPA Method 4; SOx - EPA Method 6C or 8 or ARB Method 100; fuel gas sulfur as H2S content - EPA Method 11 or 15; and fuel hhv (MMBtu) - ASTM D 1826 or D 1945 in conjunction with ASTM D 3588. [District Rule 1081, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
20. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

21. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
22. All NO<sub>x</sub>, CO, and O<sub>2</sub> emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
23. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
24. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 4320] Federally Enforceable Through Title V Permit
25. If the steam generator is not fired on PUC-regulated natural gas and compliance is achieved through fuel sulfur content limitations, then the sulfur content of the fuel shall be determined by testing sulfur content at a location after all fuel sources are combined prior to incineration, or by performing mass balance calculations based on monitoring the sulfur content and volume of each fuel source. The sulfur content of the fuel shall be determined using the test methods referenced in this permit. [District Rule 4320] Federally Enforceable Through Title V Permit
26. Permittee shall maintain records of fuel gas sulfur compound measurements. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
27. If the unit is fired on PUC-regulated natural gas, valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy the fuel sulfur content analysis, provided they establish the fuel sulfur concentration and higher heating value. [District Rule 4320] Federally Enforceable Through Title V Permit
28. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

## Attachment II Emissions Profiles

Permit #: S-1326-26-24	<b>Last Updated</b>
Facility: VINTAGE PRODUCTION CALIFORNIA	11/12/2014 RINALDIR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	1727.0	72.0	203.0	9399.0	1600.0
Daily Emis. Limit (lb/Day)	4.7	0.2	0.6	37.3	4.4
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-1326-27-21	<b>Last Updated</b>
Facility: VINTAGE PRODUCTION CALIFORNIA	11/12/2014 RINALDIR

Equipment Pre-Baselined: NO

	<u><b>NOX</b></u>	<u><b>SOX</b></u>	<u><b>PM10</b></u>	<u><b>CO</b></u>	<u><b>VOC</b></u>
Potential to Emit (lb/Yr):	1727.0	72.0	203.0	9399.0	1600.0
Daily Emis. Limit (lb/Day)	4.7	0.2	0.6	37.3	4.4
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-1326-28-20	<b>Last Updated</b>
Facility: VINTAGE PRODUCTION CALIFORNIA	11/12/2014 RINALDIR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	0.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.0
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					



Permit #: S-1326-35-17	<b>Last Updated</b>
Facility: VINTAGE PRODUCTION CALIFORNIA	11/12/2014 RINALDIR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	3668.0	156.0	438.0	20258.0	3449.0
Daily Emis. Limit (lb/Day)	10.1	0.4	1.2	32.0	9.5
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-1326-263-25	<b>Last Updated</b>
Facility: VINTAGE PRODUCTION CALIFORNIA	11/12/2014 RINALDIR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	0.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.0
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-1326-405-2	<b>Last Updated</b>
Facility: VINTAGE PRODUCTION CALIFORNIA	11/12/2014 RINALDIR

Equipment Pre-Baselined: NO

	<u><b>NOX</b></u>	<u><b>SOX</b></u>	<u><b>PM10</b></u>	<u><b>CO</b></u>	<u><b>VOC</b></u>
Potential to Emit (lb/Yr):	5957.0	2122.0	2234.0	5510.0	4095.0
Daily Emis. Limit (lb/Day)	16.3	5.8	6.1	15.1	11.2
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-1326-406-2	<b>Last Updated</b>
Facility: VINTAGE PRODUCTION CALIFORNIA	11/12/2014 RINALDIR

Equipment Pre-Baselined: NO

	<u><b>NOX</b></u>	<u><b>SOX</b></u>	<u><b>PM10</b></u>	<u><b>CO</b></u>	<u><b>VOC</b></u>
Potential to Emit (lb/Yr):	5957.0	2122.0	2234.0	5510.0	4095.0
Daily Emis. Limit (lb/Day)	16.3	5.8	6.1	15.1	11.2
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-1326-407-2	<b>Last Updated</b>
Facility: VINTAGE PRODUCTION CALIFORNIA	11/12/2014 RINALDIR

Equipment Pre-Baselined: NO

	<u><b>NOX</b></u>	<u><b>SOX</b></u>	<u><b>PM10</b></u>	<u><b>CO</b></u>	<u><b>VOC</b></u>
Potential to Emit (lb/Yr):	5957.0	2122.0	2234.0	5510.0	4095.0
Daily Emis. Limit (lb/Day)	16.3	5.8	6.1	15.1	11.2
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-1326-417-2	<b>Last Updated</b>
Facility: VINTAGE PRODUCTION CALIFORNIA	11/12/2014 RINALDIR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	5957.0	2122.0	2234.0	13775.0	4095.0
Daily Emis. Limit (lb/Day)	16.3	5.8	6.1	37.7	11.2
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-1326-418-2	Last Updated
Facility: VINTAGE PRODUCTION CALIFORNIA	11/12/2014 RINALDIR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	5957.0	2122.0	2234.0	13775.0	4095.0
Daily Emis. Limit (lb/Day)	16.3	5.8	6.1	37.7	11.2
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

## Attachment III Draft ATCs



San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

**PERMIT NO:** S-1326-26-24

**LEGAL OWNER OR OPERATOR:** CALIFORNIA RESOURCES PRODUCTION CORP  
**MAILING ADDRESS:** 9600 MING AVENUE, SUITE 300  
BAKERSFIELD, CA 93311

**LOCATION:** HEAVY OIL CENTRAL STATIONARY SOURCE  
KERN COUNTY, CA

**SECTION:** NE23 **TOWNSHIP:** 28S **RANGE:** 27E

**EQUIPMENT DESCRIPTION:**

MODIFICATION THERMALLY ENHANCED OIL RECOVERY OPERATION WITH WELL VENT VAPOR CONTROL SYSTEM SERVING 120 STEAM ENHANCED WELLS, INCLUDING SULFA-TREAT SYSTEM, GAS TRAPS, COLLECTION PIPING, VAPOR COMPRESSOR WITH ELECTRIC MOTOR, AND PIPING TO FIELD FUEL GAS SYSTEM, APPROVED COMBUSTION DEVICES, DOGGR DISPOSAL WELL, AND FLARE (FANO): DESIGNATE S-1326-405, '-406, '-407, '-417 AND '-418 AS AUTHORIZED DISPOSAL DEVICES.

## CONDITIONS

1. {1829} The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. TEOR operation shall include sulfatreat system, gas traps, collection piping, vapor compressor with electric motor, piping to field fuel gas system, piping to steam generators S-1326-9, '-294, '-314, '-337, '-338, '-385, '-390, '-391, '-392, '-400, '-401, '-405, '-406, '-407, '-417 and '-418 and '-419 through '-425, DOGGR disposal well and flare (Fano). [District Rule 2201] Federally Enforceable Through Title V Permit
3. Wells may be operated with closed casing vents or be vented to vapor control system. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Fluids produced from wells with closed vents shall be introduced only to production equipment served by vapor control system listed on tank S-1326-46 which is 99% efficient. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

Arnaud Marjollet, Director of Permit Services

S-1326-26-24 : Jan 6 2015 8:36AM -- RINALDIR : Joint Inspection Required with RINALDIR

5. {1294} The crude oil production from wells associated with this permit unit shall not lie within 1000 feet of an air injection well used for in-situ combustion. [District Rule 4407, 2.0, 3.4, and 3.5] Federally Enforceable Through Title V Permit
6. During the time any steam-enhanced crude oil production well is undergoing service or repair while the well is not producing, it shall be exempt from the emission control requirements of District Rule 4401, 5.0 (as amended January 15, 1998). [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit
7. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (as amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit
8. {1297} The operator shall maintain monitoring records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401, 6.1] Federally Enforceable Through Title V Permit
9. {1298} The uncontrolled VOC emissions from any well vent shall be reduced by at least 99 percent by weight or, if several steam-enhanced crude oil production well vents are connected to a vapor collection and control system, total uncontrolled VOC emissions shall be reduced by at least 99 percent. This requirement does not apply to cyclic wells located on contiguous and adjacent oil production properties with less than 10 cyclic wells owned by or under the control of a company. [District Rule 4401, 5.1 and 5.2] Federally Enforceable Through Title V Permit
10. {1299} For cyclic wells located on properties with less than 10 cyclic wells and owned by a company, the uncontrolled VOC emissions from any well vent or system of well vents connected to a single control device shall be reduced by at least 50 percent. Properties shall include contiguous and adjacent oil production properties owned by or under control of the company. [District Rule 4401, 5.4] Federally Enforceable Through Title V Permit
11. Total number of leaks from the vapor collection and control system, including condensate handling, shall not exceed the number as allowed by Rule 4401 (as amended January 15, 1998) at any one time. [District Rule 4401, 5.3] Federally Enforceable Through Title V Permit
12. {1302} Operator shall affix a readily visible tag bearing the date on which a leak is detected. The tag shall remain in place until the leaking component is repaired. [District Rule 4401, 5.3.1] Federally Enforceable Through Title V Permit
13. {1303} Operator shall repair each leak within 15 days of detection. The APCO may grant a 10 day extension if the operator demonstrates that the necessary and sufficient actions have and are being taken to correct the leak. [District Rule 4401, 5.3.1] Federally Enforceable Through Title V Permit
14. {1304} Operator shall maintain all components of a well vent vapor collection and control system in good repair. Components of the well vent vapor collection and control system shall include all piping, valves, fittings, pumps, compressors, tanks, etc. used to collect, control, store, or dispose of VOC condensate or non-condensable VOCs and which is prior to any blending of VOC condensate with crude oil or blending of non-condensable VOCs with gases to be used as a fuel. [District Rule 4401, 5.3 and 5.3.2] Federally Enforceable Through Title V Permit
15. Annual control efficiency compliance tests shall be performed on all vapor collection and control systems used to control emissions from steam-enhanced crude oil production wells. Testing shall be performed by source tester certified by the California Air Resource Board (CARB) certified contractors during June, July, August or September of each year if the system's control efficiency is dependent upon ambient air temperature. The APCO may waive the requirements of this condition if the vapor control system does not exhaust to atmosphere or if all uncondensed VOC emissions collected by a vapor collection and control system are burned in fuel burning equipment or in a smokeless open flare and the source's Operating Permit contains adequate periodic monitoring to ensure the source meets 99% control efficiency. [District Rule 4401, 5.1, 5.2 and 6.2.1] Federally Enforceable Through Title V Permit
16. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule District Rule 4401, 6.3.1] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

17. The permittee shall perform leak inspections at least annually, using a portable hydrocarbon detection instrument in accordance with USEPA Method 21. [District Rules 2520, 9.3.2 and 4401, 6.3.3] Federally Enforceable Through Title V Permit
18. Compliance with permit conditions in the Title V permit shall be deemed compliance with Kern County Rule 108.1. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
19. Compliance with permit conditions in the Title V permit shall be deemed compliance with SJVUAPCD Rule 4401 (Amended January 15, 1998), excluding sections 5.1 and 5.2 for control systems which have been waived from complying with the requirement of section 6.2.1. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
20. {1311} The requirements of SJVUAPCD Rule 4407 (Adopted May 19, 1994) do not apply to this permit unit. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
21. Permittee shall maintain with the permit a current listing of all steam enhanced wells connected to the casing vent control system and shall make such listing readily available for District inspection upon request. [District Rule 4401] Federally Enforceable Through Title V Permit
22. Sulfur content of scrubbed TEOR gas and flare pilot gas shall not exceed 1 gr/100scf. [District Rule 2201] Federally Enforceable Through Title V Permit
23. The well vent vapors and tank vapors from vapor collection systems #S-1326-46 shall vent only to existing otherwise permit exempt combustion equipment, DOGGR approved injection wells, 2.9 MMBtu/hr waste gas flare, or steam generators S-1326-9, '-294, '-314, '-337, '-338, '-385, '-390, '-391, '-392, '-400, '-401, '-405, '-406, '-407, '-417, '-418 and '-419 through '-425. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Flare shall be used exclusively for incineration of vapors from this TEOR control system and tank vapor control systems #S-1326-46. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Collected liquids shall be piped only to vapor controlled tanks. [District Rule 2201] Federally Enforceable Through Title V Permit
26. VOC content of well vent vapor gas shall not exceed 10% by weight. If the VOC content of the well vent vapor gas is less than 10% by weight for 8 consecutive quarterly samplings per District approved plan, sampling frequency shall only be required annually. Representative samples shall be collected during periods of normal operation and not be within 48 hours after routine maintenance or repair. Records of test shall be maintained for a period of five years and be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
27. The VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 or the latest revision of ASTM Method E168, E169 or E260 for liquids. [District Rule 4401, 6.3.5] Federally Enforceable Through Title V Permit
28. Emissions rates shall not exceed any of the following: VOC: 0.063 lb/MMBtu; NOx: 0.068 lb/MMBtu; PM10: 0.008 lb/MMBtu; and CO: 0.37 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
29. The higher heating value of the flared gas shall be monitored at least quarterly. Measured higher heating value and quantity of gas flared shall be used to determine compliance with heat input limits. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
30. Permittee shall test annually the sulfur content of casing gas combusted in permit exempt equipment using ASTM method D1072, D3031, D4084, or D3246 and make test results readily available for District inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
31. The flare shall be operated according to the manufacturer's specifications, a copy of which shall be maintained on site. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

32. If this flare requires a pilot flame, then the flare shall be operated with a flame present at all times, and kept in operation when emissions may be vented to it. The presence of a flare pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
33. Permittee shall maintain daily records of pilot gas and TEOR gas flared and shall make such records readily available for District inspection for a period of five years. [District Rule 2520, 9.4.2 and District Rule 1070] Federally Enforceable Through Title V Permit
34. This flare shall be inspected every two weeks while in operation for visible emissions. If visible emissions are observed, corrective action shall be taken. If visible emissions continue, an EPA Method 9 test shall be conducted within 72 hours. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
35. This flare shall not be used as a leak control device as described in Rule 4403, 5.3.1, nor as a control device for any permit unit subject to NSPS, without modification of permit requirements to address 40 CFR 60.18. [District Rule 2520, 9.3.3] Federally Enforceable Through Title V Permit
36. Sulfa Treat equipment shall be purged with natural gas, inert gas, or air prior to opening any vessel, filter, pipeline or connection to prevent sulfur compound emissions. [District Rule 2201] Federally Enforceable Through Title V Permit

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**PERMIT NO:** S-1326-27-21

**ISSUANCE DATE:** DRAFT

**LEGAL OWNER OR OPERATOR:** CALIFORNIA RESOURCES PRODUCTION CORP  
**MAILING ADDRESS:** 9600 MING AVENUE, SUITE 300  
BAKERSFIELD, CA 93311

**LOCATION:** HEAVY OIL CENTRAL STATIONARY SOURCE  
KERN COUNTY, CA

**SECTION:** 02 **TOWNSHIP:** 28S **RANGE:** 27E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF THERMALLY ENHANCED OIL RECOVERY (TEOR) OPERATION WITH WELL VENT VAPOR CONTROL SYSTEM SERVING UP TO 100 STEAM ENHANCED WELLS INCLUDING: GAS LIQUID SEPERATORS, COMPRESSOR, CONDENSATE HANDLING AND 2.9 MMBTU/HR AIR ASSISTED FLARE (SECTION 2 EAST CVR): DESIGNATE S-1326-405, '-406, '-407, '-417 AND '-418 AS AUTHORIZED DISPOSAL DEVICES.

**CONDITIONS**

1. {1829} The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Wells may be operated with closed casing vents or be vented to vapor control system. [District Rule 2201] Federally Enforceable Through Title V Permit
3. TEOR operation (Section 2 East CVR) shall include gas liquid separator, compressor, condensate handling equipment, 2.9 MMBtu/hr McGill, #1011-2, flare equipped with 2 in. dia. burner tip, 1/2 hp air assist blower, and K/O drum at flare base and vapor piping from TEOR system S-1326-28 . [District Rule 2201] Federally Enforceable Through Title V Permit
4. The well vent vapors shall vent only to 2.9 MMBtu/hr waste gas flare or steam generators S-1326-9, '-294, '-314, '-337, '-338, '-385, '-390, '-391, '-392, '-400, '-401, '-405, '-406, '-407, '-417, '-418 and '-419 through '-425. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Fluids produced from wells with closed vents shall be introduced only to production equipment served by vapor control system listed on tank S-1326-201 which is 99% efficient. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director APCO

Arnaud Marjollet, Director of Permit Services

S-1326-27-21 : Jan 6 2015 8:36AM -- RINALDIR : Joint Inspection Required with RINALDIR

6. {1294} The crude oil production from wells associated with this permit unit shall not lie within 1000 feet of an air injection well used for in-situ combustion. [District Rule 4407, 2.0, 3.4, and 3.5] Federally Enforceable Through Title V Permit
7. During the time any steam-enhanced crude oil production well is undergoing service or repair while the well is not producing, it shall be exempt from the emission control requirements of District Rule 4401, 5.0 (as amended January 15, 1998). [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit
8. All required source testing shall conform to the compliance testing procedures described in District Rule 1081(as amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit
9. {1297} The operator shall maintain monitoring records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401, 6.1] Federally Enforceable Through Title V Permit
10. {1298} The uncontrolled VOC emissions from any well vent shall be reduced by at least 99 percent by weight or, if several steam-enhanced crude oil production well vents are connected to a vapor collection and control system, total uncontrolled VOC emissions shall be reduced by at least 99 percent. This requirement does not apply to cyclic wells located on contiguous and adjacent oil production properties with less than 10 cyclic wells owned by or under the control of a company. [District Rule 4401, 5.1 and 5.2] Federally Enforceable Through Title V Permit
11. {1299} For cyclic wells located on properties with less than 10 cyclic wells and owned by a company, the uncontrolled VOC emissions from any well vent or system of well vents connected to a single control device shall be reduced by at least 50 percent. Properties shall include contiguous and adjacent oil production properties owned by or under control of the company. [District Rule 4401, 5.4] Federally Enforceable Through Title V Permit
12. Total number of leaks from the vapor collection and control system, including condensate handling, shall not exceed the number as allowed by Rule 4401 (as amended January 15, 1998) at any one time. [District Rule 4401, 5.3] Federally Enforceable Through Title V Permit
13. {1302} Operator shall affix a readily visible tag bearing the date on which a leak is detected. The tag shall remain in place until the leaking component is repaired. [District Rule 4401, 5.3.1] Federally Enforceable Through Title V Permit
14. {1303} Operator shall repair each leak within 15 days of detection. The APCO may grant a 10 day extension if the operator demonstrates that the necessary and sufficient actions have and are being taken to correct the leak. [District Rule 4401, 5.3.1] Federally Enforceable Through Title V Permit
15. {1304} Operator shall maintain all components of a well vent vapor collection and control system in good repair. Components of the well vent vapor collection and control system shall include all piping, valves, fittings, pumps, compressors, tanks, etc. used to collect, control, store, or dispose of VOC condensate or non-condensable VOCs and which is prior to any blending of VOC condensate with crude oil or blending of non-condensable VOCs with gases to be used as a fuel. [District Rule 4401, 5.3 and 5.3.2] Federally Enforceable Through Title V Permit
16. Annual control efficiency compliance tests shall be performed on all vapor collection and control systems used to control emissions from steam-enhanced crude oil production wells. Testing shall be performed by source tester certified by the California Air Resource Board (CARB) certified contractors during June, July, August or September of each year if the system's control efficiency is dependent upon ambient air temperature. The APCO may waive the requirements of this condition if the vapor control system does not exhaust to atmosphere or if all uncondensed VOC emissions collected by a vapor collection and control system are burned in fuel burning equipment or in a smokeless open flare and the source's Operating Permit contains adequate periodic monitoring to ensure the source meets 99% control efficiency. [District Rule 4401, 5.1, 5.2 and 6.2.1] Federally Enforceable Through Title V Permit
17. The control efficiency, measured and calculated as carbon ,of the vapor collection and control system used to control VOC emissions from steam enhanced crude oil production well shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound. [District Rule 4401, 6.3.1] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

18. The source shall perform leak inspections at least annually, using a portable hydrocarbon detection instrument in accordance with USEPA Method 21. [District Rules 2520, 9.3.2 and 4401, 6.3.3] Federally Enforceable Through Title V Permit
19. Permittee shall maintain with the permit a current listing of all steam enhanced wells connected to the casing vent control system and shall make such listing readily available for District inspection upon request. [District Rule 4401, 6.6] Federally Enforceable Through Title V Permit
20. Compliance with permit conditions in the Title V permit shall be deemed compliance with Kern County Rule 108.1. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
21. Compliance with permit conditions in the Title V permit shall be deemed compliance with SJVUAPCD Rule 4401 (Amended January 15, 1998), excluding sections 5.1 and 5.2 for control systems which have been waived from complying with the requirement of section 6.2.1. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
22. {2459} The requirements of District Rule 4407 (Adopted May 19, 1994) do not apply to this permit unit because it is not an in situ combustion well vent. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
23. Flare Visible emissions shall not exceed 1/4 Ringelmann. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Sulfur content of scrubbed TEOR gas and flare pilot gas shall not exceed 1 gr/100scf. [District Rule 2201] Federally Enforceable Through Title V Permit
25. All well vent gas shall be scrubbed prior to incineration in 2.9 MMBtu/hr waste gas flare or steam generators S-1326-9, '-294, '-314, '-337, '-338, '-385, '-390, '-391, '-392, '-400, '-401, '-405, '-406, '-407, '-417, '-418 and '-419 through '-425. [District Rule 2201] Federally Enforceable Through Title V Permit
26. Emission rates for flare shall not exceed any of the following limits: 0.008 lb-PM10/MMBtu, 0.068 lb-NOx/MMBtu (as NO2), 0.063 lb-VOC/MMBtu, or 0.37 lb-CO/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
27. The higher heating value of the flared gas shall be monitored at least quarterly. Measured higher heating value and quantity of gas flared shall be used to determine compliance with heat input limits. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
28. VOC content of well vent vapor gas shall not exceed 10% by weight. If the VOC content of the well vent vapor gas is less than 10% by weight for 8 consecutive quarterly samplings per District approved plan, sampling frequency shall only be required annually. Representative samples shall be collected during periods of normal operation and not be within 48 hours after routine maintenance or repair. Records of test shall be maintained for a period of five years and be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
29. The VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 or the latest revision of ASTM Method E168, E169 or E260 for liquids. [District Rule 4401, 6.3.5] Federally Enforceable Through Title V Permit
30. Permittee shall test annually the sulfur content of scrubbed casing gas using ASTM method D1072, D3031, D4084, or D3246 and make test results readily available for District inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
31. Permittee shall maintain a current well roster and shall make such roster, component count and resulting emissions readily available for District inspection upon request. [District Rule 1070]
32. Condensed liquids from condensate handling system shall be piped in closed systems to the WASP disposal well. [District Rule 2201] Federally Enforceable Through Title V Permit
33. Emergency condensate overflow pit shall be empty except during breakdown conditions pursuant to Rule 1100. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

34. All wells served by this vapor control system shall be shut-in and shall not vent to the atmosphere in the event of failure of the non-condensable VOC disposal system. [District Rule 2201] Federally Enforceable Through Title V Permit
35. Permittee shall at least monthly, measure and record sulfur content and BTU content of TEOR gas exiting the desulfurizer using ASTM method D1072, D3031, D4084, D3246 or a gas detector tube, and shall make all records and analyses readily available for District inspection. [District Rule 2201 and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
36. Permittee shall maintain daily records of pilot gas and TEOR gas flared and shall make such records readily available for District inspection for a period of five years. [District Rule 2520, 9.4.2 and District Rule 1070] Federally Enforceable Through Title V Permit
37. The flare shall be operated according to the manufacturer's specifications, a copy of which shall be maintained on site. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
38. If this flare requires a pilot flame, then the flare shall be operated with a flame present at all times, and kept in operation when emissions may be vented to it. The presence of a flare pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
39. This flare shall be inspected every two weeks while in operation for visible emissions. If visible emissions are observed, corrective action shall be taken. If visible emissions continue, an EPA Method 9 test shall be conducted within 72 hours. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
40. This flare shall not be used as a leak control device as described in Rule 4403, 5.3.1, nor as a control device for any permit unit subject to NSPS, without modification of permit requirements to address 40 CFR 60.18. [District Rule 2520, 9.3.3] Federally Enforceable Through Title V Permit

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San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

**PERMIT NO:** S-1326-28-20

**LEGAL OWNER OR OPERATOR:** CALIFORNIA RESOURCES PRODUCTION CORP  
**MAILING ADDRESS:** 9600 MING AVENUE, SUITE 300  
BAKERSFIELD, CA 93311

**LOCATION:** HEAVY OIL CENTRAL STATIONARY SOURCE  
KERN COUNTY, CA

**SECTION: 2 TOWNSHIP: 28S RANGE: 27E**

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF THERMALLY ENHANCED OIL RECOVERY OPERATION INCLUDING DEEP EMERGENCY OVERFLOW PIT WITH MESH COVER, HORIZONTAL GAS LIQUID SEPARATOR, AIR-COOLED HEAT EXCHANGER, HORIZONTAL CONDENSATE COLLECTION VESSEL WITH LIQUID TRANSFER PUMPS, 30 HP COMPRESSOR (K-101), 2.9 MMBTU/HR MCGILL STANDBY FLARE (#1011-2) EQUIPPED WITH 2 IN DIA BURNER TIP, AIR ASSIST BLOWER, KO DRUM SHARED WITH PERMIT UNIT S-1326-27, AND WELL VENT VAPOR CONTROL SYSTEM SERVING 150 STEAM DRIVE WELLS: DESIGNATE S-1326-405, '-406, '-407, '-417 AND '-418 AS AUTHORIZED DISPOSAL DEVICES.

## CONDITIONS

1. {1829} The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. TEOR operation shall include deep emergency overflow pit with mesh cover, horizontal gas-liquid separator, air-cooled heat exchanger, horizontal condensate collection vessel with liquid transfer pumps for the pumping of condensate to heavy oil tank battery, 30 hp compressor (K-101) with compressed vapors sent to common field fuel gas line, and production well vent casing line to TEOR system S-1326-27 and steam generators S-1326-9, '-294, '-314, '-337, '-338, '-385, '-390, '-391, '-392, '-400, '-401, '-405, '-406, '-407, '-417, '-418 and '-419 through '-425. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Wells may be operated with closed casing vents or be vented to vapor control system. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

Arnaud Marjollet, Director of Permit Services

S-1326-28-20 : Jan 6 2015 8:36AM -- RINALDIR : Joint Inspection Required with RINALDIR

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4. Fluids produced from wells with closed vents shall be introduced only to production equipment served by vapor control system listed on tank S-1326-201 which is 99% efficient. [District Rule 2201] Federally Enforceable Through Title V Permit
5. {1294} The crude oil production from wells associated with this permit unit shall not lie within 1000 feet of an air injection well used for in-situ combustion. [District Rule 4407, 2.0, 3.4, and 3.5] Federally Enforceable Through Title V Permit
6. During the time any steam-enhanced crude oil production well is undergoing service or repair while the well is not producing, it shall be exempt from the emission control requirements of District Rule 4401, 5.0 (as amended January 15, 1998). [District Rule 4401, 4.1] Federally Enforceable Through Title V Permit
7. All required source testing shall conform to the compliance testing procedures described in District Rule 1081(as amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit
8. {1297} The operator shall maintain monitoring records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401, 6.1] Federally Enforceable Through Title V Permit
9. {1298} The uncontrolled VOC emissions from any well vent shall be reduced by at least 99 percent by weight or, if several steam-enhanced crude oil production well vents are connected to a vapor collection and control system, total uncontrolled VOC emissions shall be reduced by at least 99 percent. This requirement does not apply to cyclic wells located on contiguous and adjacent oil production properties with less than 10 cyclic wells owned by or under the control of a company. [District Rule 4401, 5.1 and 5.2] Federally Enforceable Through Title V Permit
10. {1299} For cyclic wells located on properties with less than 10 cyclic wells and owned by a company, the uncontrolled VOC emissions from any well vent or system of well vents connected to a single control device shall be reduced by at least 50 percent. Properties shall include contiguous and adjacent oil production properties owned by or under control of the company. [District Rule 4401, 5.4] Federally Enforceable Through Title V Permit
11. Total number of leaks from the vapor collection and control system, including condensate handling, shall not exceed the number as allowed by Rule 4401 (as amended January 15, 1998) at any one time. [District Rule 4401, 5.3] Federally Enforceable Through Title V Permit
12. {1302} Operator shall affix a readily visible tag bearing the date on which a leak is detected. The tag shall remain in place until the leaking component is repaired. [District Rule 4401, 5.3.1] Federally Enforceable Through Title V Permit
13. {1303} Operator shall repair each leak within 15 days of detection. The APCO may grant a 10 day extension if the operator demonstrates that the necessary and sufficient actions have and are being taken to correct the leak. [District Rule 4401, 5.3.1] Federally Enforceable Through Title V Permit
14. {1304} Operator shall maintain all components of a well vent vapor collection and control system in good repair. Components of the well vent vapor collection and control system shall include all piping, valves, fittings, pumps, compressors, tanks, etc. used to collect, control, store, or dispose of VOC condensate or non-condensable VOCs and which is prior to any blending of VOC condensate with crude oil or blending of non-condensable VOCs with gases to be used as a fuel. [District Rule 4401, 5.3 and 5.3.2] Federally Enforceable Through Title V Permit
15. Annual control efficiency compliance tests shall be performed on all vapor collection and control systems used to control emissions from steam-enhanced crude oil production wells. Testing shall be performed by source tester certified by the California Air Resource Board (CARB) certified contractors during June, July, August or September of each year if the system's control efficiency is dependent upon ambient air temperature. The APCO may waive the requirements of this condition if the vapor control system does not exhaust to atmosphere or if all uncondensed VOC emissions collected by a vapor collection and control system are burned in fuel burning equipment or in a smokeless open flare and the source's Operating Permit contains adequate periodic monitoring to ensure the source meets 99% control efficiency. [District Rule 4401, 5.1, 5.2 and 6.2.1] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

16. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25a may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule District Rule 4401, 6.3.1] Federally Enforceable Through Title V Permit
17. The permittee shall perform leak inspections at least annually, using a portable hydrocarbon detection instrument in accordance with USEPA Method 21. [District Rules 2520, 9.3.2 and 4401, 6.3.3] Federally Enforceable Through Title V Permit
18. Compliance with permit conditions in the Title V permit shall be deemed compliance with Kern County Rule 108.1. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
19. Compliance with permit conditions in the Title V permit shall be deemed compliance with SJVUAPCD Rule 4401 (Amended January 15, 1998), excluding sections 5.1 and 5.2 for control systems which have been waived from complying with the requirement of section 6.2.1. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
20. {2459} The requirements of District Rule 4407 (Adopted May 19, 1994) do not apply to this permit unit because it is not an in situ combustion well vent. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
21. Components shall be maintained and leaks shall be repaired as specified in Rule 4401. [District Rule 2201] Federally Enforceable Through Title V Permit
22. The VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 or the latest revision of ASTM Method E168, E169 or E260 for liquids. [District Rule 4401, 6.3.5] Federally Enforceable Through Title V Permit
23. Permittee shall maintain with the permit a current listing of all steam enhanced wells connected to the casing vent control system and shall make such listing readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Well vent vapor control system shall include vapor piping connected to tank vapor control system listed on permit #S-1326-201. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Sulfur content of scrubbed TEOR gas shall not exceed 1 gr/100scf. [District Rule 2201] Federally Enforceable Through Title V Permit
26. Sulfur scrubber shall be operated to maintain continued compliance with fuel gas sulfur content limit of 1 grain-S/100 scf of fuel gas. [District Rule 2201] Federally Enforceable Through Title V Permit
27. Only PUC quality natural gas or comparable quality lease gas with sulfur content of 1 grain-S/100 scf or less shall be utilized as make-up gas for the horizontal condensate collection vessel and utilized as pilot fuel for standby flare. [District Rule 2201] Federally Enforceable Through Title V Permit
28. Sulfur scrubber shall be monitored monthly for H<sub>2</sub>S content of gas after treatment to determine when recharging is required. [District Rule 2201] Federally Enforceable Through Title V Permit
29. Permittee shall maintain a written record of H<sub>2</sub>S content and recharging dates and such records shall be made readily available for District inspection upon request. [District NSR Rule and District Rule 1070] Federally Enforceable Through Title V Permit
30. Permittee shall test annually the sulfur content of scrubbed casing gas using ASTM method D1072, D3031, D4084, or D3246 and make test results readily available for District inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

31. VOC content of well vent vapor gas shall not exceed 10% by weight. If the VOC content of the well vent vapor gas is less than 10% by weight for 8 consecutive quarterly samplings per District approved plan, sampling frequency shall only be required annually. Representative samples shall be collected during periods of normal operation and not be within 48 hours after routine maintenance or repair. Records of test shall be maintained for a period of five years and be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
32. The emergency condensate overflow pit shall be empty except during breakdown conditions pursuant to Rule 1100. [District Rule 2201] Federally Enforceable Through Title V Permit
33. Well head casing vent gas collection system shall be shut-in and shall not vent to the atmosphere in the event of failure of the non-condensable VOC disposal system. [District Rule 2201] Federally Enforceable Through Title V Permit

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San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

**PERMIT NO:** S-1326-35-17

**LEGAL OWNER OR OPERATOR:** CALIFORNIA RESOURCES PRODUCTION CORP  
**MAILING ADDRESS:** 9600 MING AVENUE, SUITE 300  
BAKERSFIELD, CA 93311

**LOCATION:** HEAVY OIL CENTRAL STATIONARY SOURCE  
KERN COUNTY, CA

**SECTION:** 14 **TOWNSHIP:** 28S **RANGE:** 27E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF THERMALLY ENHANCED OIL RECOVERY OPERATION WITH WELL VENT VAPOR CONTROL SYSTEM SERVING 250 STEAM ENHANCED WELLS, INCLUDING 50 HP COMPRESSOR, ONE AIR-COOLED VAPOR CONDENSER, AND PIPING TO FIELD FUEL GAS SYSTEM, DOGGR DISPOSAL WELL, AND/OR 3.6 MMBTU/HR KALDAIR FLARE INCLUDING TWO 8000 LB SULFATREAT CANISTERS (ONE AS BACKUP) (SECTION 14 YOUNG): DESIGNATE UNITS AS APPROVED COMBUSTION DEVICES FOR S-1326-405, '-406, '-407, '-417 AND '-418

## CONDITIONS

1. {1829} The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Fluids produced from wells with closed vents shall be introduced only to production equipment served by vapor control system listed on tank S-1326-201 which is 99% efficient. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Well vent vapors shall vent to the field fuel gas system, DOGGR approved injection wells, flare listed on this permit, or steam generators S-1326-9, '-294, '-314, '-337, '-338, '-385, '-390, '-391, '-392, '-400, '-401, '-405, '-406, '-407, '-417 and '-418 and '-419 through '-425. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Well head casing vent collection piping network shall be limited to 250 steam enhanced wells. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Sulfur scrubber shall be monitored monthly for H2S content of gas after treatment to determine when recharging is required. [District NSR Rule and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services

S-1326-35-17 : Jan 6 2015 8:36AM -- RINALDIR : Joint Inspection Required with RINALDIR

6. Sulfur content of gas combusted in flare shall not exceed 1 gr/100 scf. [District NSR Rule, District Rule 4801, and Kern County Rule 407] Federally Enforceable Through Title V Permit
7. Permittee shall test annually the sulfur content of gas combusted in flare using ASTM method D1072, D3031, D4084, or D3246 and make test results readily available for District inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
8. Flare shall operate with no visible emission in excess of 5% opacity. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Maximum amount of gas (pilot and waste gas) combusted by flare shall not exceed 150.0 MMBtu/day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Emissions from the flare shall not exceed any of the following limits (based on total gas combusted): NO<sub>x</sub> (as NO<sub>2</sub>): 0.068 lb/MMBtu; PM<sub>10</sub>: 0.008 lb/MMBtu; CO: 0.37 lb/MMBtu; or VOC: 0.063 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The higher heating value of the flared gas shall be monitored at least quarterly. Measured higher heating value and quantity of gas flared shall be used to determine compliance with heat input limit. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
12. The flare shall be operated according to the manufacturer's specifications, a copy of which shall be maintained on site. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. If this flare requires a pilot flame, then the flare shall be operated with a flame present at all times, and kept in operation when emissions may be vented to it. The presence of a flare pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. This flare shall be inspected every two weeks while in operation for visible emissions. If visible emissions are observed, corrective action shall be taken. If visible emissions continue, an EPA Method 9 test shall be conducted within 72 hours. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. This flare shall not be used as a leak control device as described in Rule 4403, 5.3.1, nor as a control device for any permit unit subject to NSPS, without modification of permit requirements to address 40 CFR 60.18. [District Rule 2520, 9.3.3] Federally Enforceable Through Title V Permit
16. A gas leak is defined as the detection of a concentration of total organic compounds, above background (measured in accordance with EPA Method 21) that exceeds the following values: 1) A major gas leak is a detection of greater than 10,000 ppmv as methane; and 2) A minor gas leak is a detection of 400 to 10,000 ppmv as methane for pressure relief devices (PRDs) and 2,000 to 10,000 for components other than PRDs. [District Rule 4401] Federally Enforceable Through Title V Permit
17. A liquid leak is defined as the dripping of VOC-containing liquid. A major liquid leak is a visible mist or a continuous flow of liquid that is not seal lubricant. A minor liquid leak is a liquid leak that is not a major liquid leak and drips liquid at a rate of more than three drops per minute, except for seal lubricant. [District Rule 4401] Federally Enforceable Through Title V Permit
18. During the time any steam-enhanced crude oil production well is undergoing service or repair while the well is not producing, it shall be exempt from the emission control requirements of District Rule 4401, 5.0 (as amended December 14, 2006). [District Rule 4401] Federally Enforceable Through Title V Permit
19. The following conditions shall be used to determination of a violation: 1) Existence of an open-ended line or a valve located at the end of the line that is not sealed with a blind flange, plug, cap, or a second closed valve that is not closed at all times, except during attended operations requiring process fluid flow through the open-ended lines. Attended operations include draining or degassing operations, connection of temporary process equipment, sampling of process streams, emergency venting, and other normal operational needs, provided such operations are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere; 2) Existence of a component with a major liquid leak; 3) Existence of a component with a gas leak greater than 50,000 ppmv; or 4) Existence of a component leak consisting of a minor liquid or gas leak, or a gas leak greater than 10,000 ppmv up to 50,000 ppmv, in excess of the allowable number of leaks specified in Table 3 of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

20. Total number of leaks from the vapor collection and control system, including condensate handling, shall not exceed the number as allowed by Rule 4401 (as amended December 14, 2006) at any one time. [District Rule 4401] Federally Enforceable Through Title V Permit
21. Operator shall affix a readily visible tag bearing the date and time of leak detection, the date and time of leak measurement, the leak concentration of gaseous leaks (in ppmv), for liquid leaks whether it is a major liquid leak or a minor liquid leak, and whether the component is an essential component, an unsafe-to monitor component, or a critical component leak. [District Rule 4401] Federally Enforceable Through Title V Permit
22. The tag shall remain in place until the leaking component is repaired, re-inspected, using the test method in Section 6.3.3, and the component is found to be in compliance with the requirements of this rule. [District Rule 4401] Federally Enforceable Through Title V Permit
23. An operator shall minimize a component leak in order to stop or reduce leakage to the atmosphere immediately to the extent possible, but not later than one (1) hour after detection of the leak. [District Rule 4401] Federally Enforceable Through Title V Permit
24. Except for leaking critical components or leaking essential components, the operator shall repair each leak within time specified in Table 3, of Rule 4401. [District Rule 4401] Federally Enforceable Through Title V Permit
25. If the leaking component is an essential component or a critical component that cannot be immediately shut down for repairs, and if the leak has been minimized but the leak still exceeds the applicable leak standard of this rule, the operator shall repair or replace the essential component or critical component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4401] Federally Enforceable Through Title V Permit
26. The operator shall not use any components that leak in excess of the applicable leak standards as specified in this permit. Components that have been found leaking in excess of the applicable leak standards of this rule may be used provided such leaking components have been identified with a tag for repair, are repaired, or are awaiting re-inspection after being repaired, within the applicable time period specified in this permit. [District Rule 4401] Federally Enforceable Through Title V Permit
27. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4401] Federally Enforceable Through Title V Permit
28. Except for pipes and unsafe-to-monitor components, an operator shall inspect all other components pursuant to the requirements of Section 6.3.3 at least once every year [District Rule 4401] Federally Enforceable Through Title V Permit
29. An operator shall visually inspect all pipes at least once every year. Any visual inspection of pipes that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected within 24 hours after detecting the leak. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 3 of this rule. [District Rule 4401] Federally Enforceable Through Title V Permit
30. An operator shall audio-visually (by hearing and by sight) inspect for leaks all accessible operating pumps, compressors, and PRDs in service at least once each calendar week. [District Rule 4401] Federally Enforceable Through Title V Permit
31. Any audio-visual inspection of an accessible operating pump, compressor, and PRD performed by an operator that indicates a leak that cannot be immediately repaired to meet the leak standards of this rule shall be inspected not later than 24 hours after conducting the audio-visual inspection. If a leak is found, the leak shall be repaired as soon as practicable but not later than the time frame specified in Table 3 of this rule. [District Rule 4401] Federally Enforceable Through Title V Permit
32. An operator shall initially inspect a PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the discovery of the release. An operator shall re-inspect the PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the initial inspection. [District Rule 4401] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

33. An operator shall inspect all new, replaced, or repaired fittings, flanges, and threaded connections within 72 hours of placing the component in service. [District Rule 4401] Federally Enforceable Through Title V Permit
34. An operator shall inspect a component, except for a PRD that releases to the atmosphere, that has been repaired or replaced not later than 15 calendar days after the component was repaired or replaced. [District Rule 4401] Federally Enforceable Through Title V Permit
35. An operator shall inspect all unsafe-to-monitor components during each turnaround. [District Rule 4401] Federally Enforceable Through Title V Permit
36. The operator shall perform leak inspections at least annually, using a portable hydrocarbon detection instrument in accordance with USEPA Method 21. Where safety is a concern, such as measuring leaks from compressor seals or pump seals when the shaft is rotating, a person shall measure leaks by placing the instrument probe inlet at a distance of one centimeter or less from the surface of the component interface. [District Rule 4401] Federally Enforceable Through Title V Permit
37. VOC content of well vent vapor gas shall not exceed 10% by weight. If the VOC content of the well vent vapor gas is less than 10% by weight for 8 consecutive quarterly samplings per District approved plan, sampling frequency shall only be required annually. Representative samples shall be collected during periods of normal operation and not be within 48 hours after routine maintenance or repair. Records of test shall be maintained for a period of five years and be made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
38. The VOC content by weight percent (wt.%) shall be determined using American Society of Testing and Materials (ASTM) D1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 or the latest revision of ASTM Method E168, E169 or E260 for liquids. [District Rule 4401] Federally Enforceable Through Title V Permit
39. Annual control efficiency compliance tests shall be performed on all vapor collection and control systems used to control emissions from steam-enhanced crude oil production wells. Testing shall be performed by source tester certified by the California Air Resource Board (CARB) certified contractors during June, July, August or September of each year if the system's control efficiency is dependent upon ambient air temperature. The APCO may waive the requirements of this condition if the vapor control system does not exhaust to atmosphere or if all uncondensed VOC emissions collected by a vapor collection and control system are burned in fuel burning equipment or in a smokeless open flare and the source's Operating Permit contains adequate periodic monitoring to ensure the source meets 99% control efficiency. [District Rule 4401] Federally Enforceable Through Title V Permit
40. The control efficiency of the vapor collection and control system used to control VOC emissions from steam enhanced crude oil production well shall be determined by mass balance based on most stringent of a source test, USEPA approved emission factors, or Air Pollution (AP)-42 emission factors for components; and the efficiency of destruction devices determined by USEPA Method 25, 25a, or 25b as applicable. [District Rule 4401] Federally Enforceable Through Title V Permit
41. Permittee shall maintain an inspection log which includes the following information: 1) the total number of components inspected and the total number and percentage of leaking components found by component type, 2) the location, type, and name or description of each leaking component and description of any unit where the leaking component is found, 3) the date and method of leak detection, 4) the size of the leak (in ppmv for gaseous leaks, and major or minor for liquid leaks), 5) the date the leaking component is repaired, replaced, or removed from service, 6) the identity and location of essential or critical components found leaking that cannot be repaired until the next regular process unit turnaround or not later than one year after leak detection, whichever comes later, 7) the methods used to minimize the leak from essential or critical components, 8) the date of re-inspection and the leak concentration (in ppmv) after the component is repaired or replaced, 9) the inspector's name, mailing address, and business telephone number, and 10) the date and signature of the facility operator responsible for the inspection and repair program certifying the accuracy of the information recorded in the log. [District Rule 4401] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE



42. Records shall be maintained of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components. The records shall include a copy of the current calibration gas certification from the vendor of the calibration gas cylinder, the date of calibration, the concentration of calibration gas, the instrument reading of calibration gas before adjustment, the instrument reading of calibration gas after adjustment, the calibration gas expiration date, and the calibration gas cylinder pressure at the time of calibration. [District Rule 4401] Federally Enforceable Through Title V Permit
43. The operator shall keep source test records which demonstrate compliance with the control efficiency requirements of the VOC collection and control system. [District Rule 4401] Federally Enforceable Through Title V Permit
44. Permittee shall establish and implement an employee training program for inspecting and repairing components and recordkeeping procedures, as necessary. Permittee shall maintain at the facility the copies of the training records of the training program. [District Rule 4401] Federally Enforceable Through Title V Permit
45. By January 30 of each year, permittee shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved OMP. [District Rule 4401] Federally Enforceable Through Title V Permit
46. Permittee shall maintain a copy of the latest APCO-approved Operator Management Plan (OMP) at the facility and make it available to the APCO, ARB, and US EPA upon request. [District Rule 4401] Federally Enforceable Through Title V Permit
47. {1297} The operator shall maintain monitoring records of the date and well identification where steam injection or well stimulation occurs. [District Rule 4401, 6.1] Federally Enforceable Through Title V Permit
48. The permittee shall keep accurate records of the amount of gas (pilot and waste gas) flared, H<sub>2</sub>S content and recharging dates, for a period of five years, and shall make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
49. Permittee shall maintain a current well roster of all wells served by collection system, and such roster shall be made readily available for District inspection upon request. [District Rule 2520, 9.3.2 and District Rule 1070] Federally Enforceable Through Title V Permit
50. All records required by this permit shall be maintained and retained on-site for a minimum of five (5) years and made available for District, ARB, and EPA inspection upon request. [District Rules 2201 and 4401] Federally Enforceable Through Title V Permit

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San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

**PERMIT NO:** S-1326-263-25

**LEGAL OWNER OR OPERATOR:** CALIFORNIA RESOURCES PRODUCTION CORP  
**MAILING ADDRESS:** 9600 MING AVENUE, SUITE 300  
BAKERSFIELD, CA 93311

**LOCATION:** HEAVY OIL CENTRAL STATIONARY SOURCE  
KERN COUNTY, CA

**SECTION:** SW23 **TOWNSHIP:** 28S **RANGE:** 27E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 3,000 BBL FIXED ROOF WASH TANK SERVED BY TANK VAPOR CONTROL SYSTEM SHARED WITH CASING VENT RECOVERY (CVR) SYSTEM LISTED ON S-1326-287 AND CRUDE OIL STORAGE TANKS S-1326-263, -279, -280, -281, -283, -285, AND '-315 (SECTION 23 FACILITY): DESIGNATE S-1326-405, '-406, '-407, '-417 AND '-418 AS AUTHORIZED DISPOSAL DEVICES.

## CONDITIONS

1. {1829} The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Collected TVR vapors shall be disposed of in a Department of Oil, Gas and Geothermal Resources (DOGGR) approved vapor disposal well, injected into the field fuel gas system and used in permit exempt equipment, or combusted in steam generators S-1326-9, '-294, '-314, '-337, '-338, '385, '-390, '-391, '-392, '-400, '-401, '-405, '-406, '-407, '-417 and '-418 [District Rules 2020 and 2201] Federally Enforceable Through Title V Permit
3. VOC content of tank vapor space and vapor control system piping and components shall not exceed 10% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Prior to injecting collected TVR (and S-1326-287 CVR) vapors into field fuel gas system, the collected vapors shall be treated by a hydrogen sulfide removal system which reduces the hydrogen sulfide concentration in the collected vapors by at least 95%. The sulfur content of the treated vapors may not exceed 1.0 grains S/ 100 scf gas. The treated TVR (and CVR) vapors injected into the field fuel gas line shall not be greater than five percent by weight hydrocarbons heavier than butane as determined by test method ASTM D-1945 or equivalent test method with prior District approval. [District Rules 2020 and 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director, APCO

Arnaud Marjollet, Director of Permit Services

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5. Operator shall ensure the vapor control system is functional and operating as designed at all times, except during periods of routine maintenance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
6. The tank shall be equipped with a vapor loss prevention system capable of collecting all VOC emissions and preventing their emissions to the atmosphere at an efficiency of at least 99% by weight. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
7. The true vapor pressure of the liquids stored in this tank shall not exceed 0.5 psia. [District Rules 4623, 4.4 and 2201] Federally Enforceable Through Title V Permit
8. Connections between this TVR system and the wellhead casing vent recovery (CVR) system listed on S-1326-287 shall be made upstream of the hydrogen sulfide removal system included in this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Permittee shall conduct tank cleaning and maintenance operations in accordance with District approved procedures as described in this permit. [District Rule 2080] Federally Enforceable Through Title V Permit
10. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2080] Federally Enforceable Through Title V Permit
11. Prior to opening the tank to allow tank cleaning, one of the following procedures must be followed: 1) Prior to venting the tank to the atmosphere, operate the tank vapor recovery system/vapor control device for at least 24 hours such that it collects the tank vapors; or 2) use liquid displacement, conducted using a liquid with a TVP less than 0.5 psia, or conducted by floating the oil pad off a crude oil tank by restricting the outflow of water, such that 90% of the tank volume is displaced; or 3) Vent the tank to a vapor control device/vapor recovery system until the vapor concentration is less than 10% of the lower explosive limit (LEL) or 5,000 ppmv whichever is less; or 4) vent the tank to the vapor control system for a length of time determined by the following relationship:  $t = 2.3 V/Q$ , where  $t$  = time,  $V$  = tank volume (cubic feet), and  $Q$  = flow rate to the vapor control system as determined using appropriate engineering calculations. [District Rule 2080] Federally Enforceable Through Title V Permit
12. The tank shall be cleaned using one of the following methods: water, hot water, solvents with an initial boiling point of greater than 302 F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams VOC per liter or less. The tank sediment may be used for road mix as allowed by Section 6.17 of District Rule 2020. [District Rule 2080] Federally Enforceable Through Title V Permit
13. Steam cleaning shall be allowed only during December through March, or at locations where wastewater treatment facilities are limited. [District Rule 2080] Federally Enforceable Through Title V Permit
14. Prior to reintroducing crude oil/water to the tank, the tank shall be filled to the maximum possible level with water, the tank vapor control system shall be reactivated and pressure/relief valves closed, and the liquid level shall be adjusted as necessary. [District Rule 2080] Federally Enforceable Through Title V Permit
15. Within 48 hours after refilling the tank with crude oil/water, the pressure relief valve seats and hatch seals shall be inspected for leaks using EPA method 21 and the regular tank maintenance and inspection program shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
16. Permittee shall maintain records of each period of cleaning and maintenance when the tank is disconnected or isolated from the vapor control system. Records shall include the date that tank cleaning was initiated, the date tank cleaning was completed, the procedure used to vent tank vapors prior to opening, the method of tank cleaning used, and a description of internal and external tank repairs and maintenance performed. Such records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit
17. Operator shall conduct quarterly gas sampling after TVR compressor (prior to connection to any other vapor control system) and at either the first line tank or at any secondary tank which is heated above ambient temperature. If gas samples are less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually and whenever there is a change in source or type of petroleum processed. Samples shall be collected during periods of normal operation, and not be within 48 hours after routine maintenance or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
18. VOC content of gas shall be measured using ASTM D-1945, EPA Method 18 referenced as methane, or equivalent test method with prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

19. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rule 4623, 6.2.2] Federally Enforceable Through Title V Permit
20. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623, 6.2.2] Federally Enforceable Through Title V Permit
21. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623, 6.4] Federally Enforceable Through Title V Permit
22. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623, 6.4] Federally Enforceable Through Title V Permit
23. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623, 6.3.6] Federally Enforceable Through Title V Permit
24. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623, 6.3.6] Federally Enforceable Through Title V Permit
25. The permittee shall keep accurate records of VOC content of vapors, liquids stored and true vapor pressure of such liquids for a period of 5 years and shall make such records available for District inspection upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
26. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**PERMIT NO:** S-1326-405-2

**ISSUANCE DATE:** DRAFT

**LEGAL OWNER OR OPERATOR:** CALIFORNIA RESOURCES PRODUCTION CORP  
**MAILING ADDRESS:** 9600 MING AVENUE, SUITE 300  
BAKERSFIELD, CA 93311

**LOCATION:** HEAVY OIL CENTRAL STATIONARY SOURCE  
KERN COUNTY, CA

**SECTION:** NE 23 **TOWNSHIP:** 28S **RANGE:** 27E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 85.0 MMBTU/HR NATURAL GAS -FIRED STEAM GENERATOR WITH NORTH AMERICAN 4231-85-  
GLE/X8701 GLE BURNER S/N SD857413-01 AND A FLUE GAS RECIRCULATION SYSTEM: AUTHORIZE  
COMBUSTION OF TEOR AND TVR GAS

**CONDITIONS**

1. {1829} The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
3. Steam generator shall be equipped with variable frequency drive electrical motors driving the blower and water pump and a convection section with at least 235 square feet of heat transfer surface area per MMBtu/hr of maximum rated heat input (verified by manufacturer) or a manufacturer's overall thermal efficiency rating of 88%. [Public Resources Code 21000-21177: California Environmental Quality Act and District Rule 2410] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

Arnaud Marjollet, Director of Permit Services

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7. The unit shall only be fired on gas with a maximum sulfur content of 1.0 gr S/100scf. [District Rules 2201, 4320 and 4801] Federally Enforceable Through Title V Permit
8. Permittee shall test annually the sulfur content of the fuel gas combusted in steam generator using ASTM method D1072, D3031, D4084, or D3246 and make test results readily available for District inspection. [District Rule 4320] Federally Enforceable Through Title V Permit
9. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
10. Emission rates shall not exceed: PM<sub>10</sub>: 0.003 lb/MMBtu, VOC: 0.0055 lb/MMBtu, NO<sub>x</sub> (as NO<sub>2</sub>): 7 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub>, or CO: 10 ppmv @ 3% O<sub>2</sub>. [District Rules 2201, 4201, 4301, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
11. A source test to demonstrate compliance with NO<sub>x</sub> and CO emission limits shall be performed within 60 days of initial startup of this unit. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
12. Source testing to measure NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
13. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate, no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
14. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
15. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
16. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
17. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5, 4306, 5.5.5, and 4320] Federally Enforceable Through Title V Permit
18. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, NO<sub>x</sub> (lb/MMBtu) - EPA Method 19; CO (ppmv) - EPA Method 10 or ARB Method 100; Stack gas oxygen (O<sub>2</sub>) - EPA Method 3 or 3A or ARB Method 100; stack gas velocities - EPA Method 2; Stack gas moisture content - EPA Method 4; SO<sub>x</sub> - EPA Method 6C or 8 or ARB Method 100; fuel gas sulfur as H<sub>2</sub>S content - EPA Method 11 or 15; and fuel hhv (MMBtu) - ASTM D 1826 or D 1945 in conjunction with ASTM D 3588. [District Rule 1081, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
19. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

20. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
21. All NO<sub>x</sub>, CO, and O<sub>2</sub> emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
22. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
23. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 4320] Federally Enforceable Through Title V Permit
24. If the steam generator is not fired on PUC-regulated natural gas and compliance is achieved through fuel sulfur content limitations, then the sulfur content of the fuel shall be determined by testing sulfur content at a location after all fuel sources are combined prior to incineration, or by performing mass balance calculations based on monitoring the sulfur content and volume of each fuel source. The sulfur content of the fuel shall be determined using the test methods referenced in this permit. [District Rule 4320] Federally Enforceable Through Title V Permit
25. Permittee shall maintain records of fuel gas sulfur compound measurements. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
26. If the unit is fired on PUC-regulated natural gas, valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy the fuel sulfur content analysis, provided they establish the fuel sulfur concentration and higher heating value. [District Rule 4320] Federally Enforceable Through Title V Permit
27. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

**PERMIT NO:** S-1326-406-2

**LEGAL OWNER OR OPERATOR:** CALIFORNIA RESOURCES PRODUCTION CORP  
**MAILING ADDRESS:** 9600 MING AVENUE, SUITE 300  
BAKERSFIELD, CA 93311

**LOCATION:** HEAVY OIL CENTRAL STATIONARY SOURCE  
KERN COUNTY, CA

**SECTION:** NE 23    **TOWNSHIP:** 28S    **RANGE:** 27E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 85.0 MMBTU/HR NATURAL GAS -FIRED STEAM GENERATOR WITH NORTH AMERICAN 4231-85-  
GLE/X8701 GLE BURNER AND A FLUE GAS RECIRCULATION SYSTEM: AUTHORIZE COMBUSTION OF TEOR AND  
TVR GAS

## CONDITIONS

1. {1829} The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
3. Steam generator shall be equipped with variable frequency drive electrical motors driving the blower and water pump and a convection section with at least 235 square feet of heat transfer surface area per MMBtu/hr of maximum rated heat input (verified by manufacturer) or a manufacturer's overall thermal efficiency rating of 88%. [Public Resources Code 21000-21177; California Environmental Quality Act and District Rule 2410] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director, APCO

Arnaud Marjollet, Director of Permit Services

S-1326-406-2 : Jan 6 2015 8:36AM - RINALDIR : Joint Inspection Required with RINALDIR



7. The unit shall only be fired on gas with a maximum sulfur content of 1.0 gr S/100scf. [District Rules 2201 4801, and 4320] Federally Enforceable Through Title V Permit
8. Permittee shall test annually the sulfur content of the fuel gas combusted in steam generator using ASTM method D1072, D3031, D4084, or D3246 and make test results readily available for District inspection. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
9. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
10. Emission rates shall not exceed: PM10: 0.003 lb/MMBtu, VOC: 0.0055 lb/MMBtu, NOx (as NO2): 7 ppmvd NOx @ 3% O2, or CO: 10 ppmv @ 3% O2. [District Rules 2201, 4201, 4301, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
11. A source test to demonstrate compliance with NOx and CO emission limits shall be performed within 60 days of initial startup of this unit. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
12. Source testing to measure NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
13. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate, no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
14. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
15. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
16. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
17. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5, 4306, 5.5.5, and 4320] Federally Enforceable Through Title V Permit
18. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19; CO (ppmv) - EPA Method 10 or ARB Method 100; Stack gas oxygen (O2) - EPA Method 3 or 3A or ARB Method 100; stack gas velocities - EPA Method 2; Stack gas moisture content - EPA Method 4; SOx - EPA Method 6C or 8 or ARB Method 100; fuel gas sulfur as H2S content - EPA Method 11 or 15; and fuel hhv (MMBtu) - ASTM D 1826 or D 1945 in conjunction with ASTM D 3588. [District Rule 1081, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
19. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

20. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit .
21. All NO<sub>x</sub>, CO, and O<sub>2</sub> emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
22. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
23. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 4320] Federally Enforceable Through Title V Permit
24. If the steam generator is not fired on PUC-regulated natural gas and compliance is achieved through fuel sulfur content limitations, then the sulfur content of the fuel shall be determined by testing sulfur content at a location after all fuel sources are combined prior to incineration, or by performing mass balance calculations based on monitoring the sulfur content and volume of each fuel source. The sulfur content of the fuel shall be determined using the test methods referenced in this permit. [District Rule 4320] Federally Enforceable Through Title V Permit
25. Permittee shall maintain records of fuel gas sulfur compound measurements. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
26. If the unit is fired on PUC-regulated natural gas, valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy the fuel sulfur content analysis, provided they establish the fuel sulfur concentration and higher heating value. [District Rule 4320] Federally Enforceable Through Title V Permit
27. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-1326-407-2

LEGAL OWNER OR OPERATOR: CALIFORNIA RESOURCES PRODUCTION CORP  
MAILING ADDRESS: 9600 MING AVENUE, SUITE 300  
BAKERSFIELD, CA 93311

LOCATION: HEAVY OIL CENTRAL STATIONARY SOURCE  
KERN COUNTY, CA

SECTION: NE 23 TOWNSHIP: 28S RANGE: 27E

### EQUIPMENT DESCRIPTION:

MODIFICATION OF 85.0 MMBTU/HR NATURAL GAS -FIRED STEAM GENERATOR WITH NORTH AMERICAN 4231-85-  
GLE/X8701 GLE BURNER S/N SD89244-04 AND A FLUE GAS RECIRCULATION SYSTEM: AUTHORIZE COMBUSTION  
OF TEOR AND TVR GAS

## CONDITIONS

1. {1829} The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
3. Steam generator shall be equipped with variable frequency drive electrical motors driving the blower and water pump and a convection section with at least 235 square feet of heat transfer surface area per MMBtu/hr of maximum rated heat input (verified by manufacturer) or a manufacturer's overall thermal efficiency rating of 88%. [Public Resources Code 21000-21177: California Environmental Quality Act and District Rule 2410] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Sayed Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services

S-1326-407-2 : Jan 6 2015 8:36AM -- RINALDIR - Joint Inspection Required with RINALDIR

7. The unit shall only be fired on gas with a maximum sulfur content of 1.0 gr S/100scf. [District Rules 2201 4801, and 4320] Federally Enforceable Through Title V Permit
8. Permittee shall test annually the sulfur content of the fuel gas combusted in steam generator using ASTM method D1072, D3031, D4084, or D3246 and make test results readily available for District inspection. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
9. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
10. Emission rates shall not exceed: PM10: 0.003 lb/MMBtu, VOC: 0.0055 lb/MMBtu, NOx (as NO2): 7 ppmvd NOx @ 3% O2, or CO: 10 ppmv @ 3% O2. [District Rules 2201, 4201, 4301, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
11. A source test to demonstrate compliance with NOx and CO emission limits shall be performed within 60 days of initial startup of this unit. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
12. Source testing to measure NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
13. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate, no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
14. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
15. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
16. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
17. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5, 4306, 5.5.5, and 4320] Federally Enforceable Through Title V Permit
18. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19; CO (ppmv) - EPA Method 10 or ARB Method 100; Stack gas oxygen (O2) - EPA Method 3 or 3A or ARB Method 100; stack gas velocities - EPA Method 2; Stack gas moisture content - EPA Method 4; SOx - EPA Method 6C or 8 or ARB Method 100; fuel gas sulfur as H2S content - EPA Method 11 or 15; and fuel hhv (MMBtu) - ASTM D 1826 or D 1945 in conjunction with ASTM D 3588. [District Rule 1081, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
19. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

20. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
21. All NO<sub>x</sub>, CO, and O<sub>2</sub> emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
22. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
23. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 4320] Federally Enforceable Through Title V Permit
24. If the steam generator is not fired on PUC-regulated natural gas and compliance is achieved through fuel sulfur content limitations, then the sulfur content of the fuel shall be determined by testing sulfur content at a location after all fuel sources are combined prior to incineration, or by performing mass balance calculations based on monitoring the sulfur content and volume of each fuel source. The sulfur content of the fuel shall be determined using the test methods referenced in this permit. [District Rule 4320] Federally Enforceable Through Title V Permit
25. Permittee shall maintain records of fuel gas sulfur compound measurements. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
26. If the unit is fired on PUC-regulated natural gas, valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy the fuel sulfur content analysis, provided they establish the fuel sulfur concentration and higher heating value. [District Rule 4320] Federally Enforceable Through Title V Permit
27. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-1326-417-2

LEGAL OWNER OR OPERATOR: CALIFORNIA RESOURCES PRODUCTION CORP  
MAILING ADDRESS: 9600 MING AVENUE, SUITE 300  
BAKERSFIELD, CA 93311

LOCATION: HEAVY OIL CENTRAL STATIONARY SOURCE  
KERN COUNTY, CA

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 85 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH NORTH AMERICAN 4231-85 GLE BURNER AND A FLUE GAS RECIRCULATION SYSTEM: AUTHORIZE COMBUSTION OF TEOR AND TVR GAS

## CONDITIONS

1. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
2. Steam generator shall be equipped with variable frequency drive electrical motors driving the blower and water pump and a convection section with at least 235 square feet of heat transfer surface area per MMBtu/hr of maximum rated heat input (verified by manufacturer) or a manufacturer's overall thermal efficiency rating of 88%. [Public Resources Code 21000-21177: California Environmental Quality Act and District Rule 2410] Federally Enforceable Through Title V Permit
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
6. The unit shall only be fired on gas with a maximum sulfur content of 1.0 gr S/100scf. [District Rules 2201 4801, and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services

S-1326-417-2 : Jan 6 2015 8:36AM -- RINALDIR : Joint Inspection Required with RINALDIR

7. Permittee shall test annually the sulfur content of the fuel gas combusted in steam generator using ASTM method D1072, D3031, D4084, or D3246 and make test results readily available for District inspection. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
8. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
9. Emission rates shall not exceed: PM<sub>10</sub>: 0.003 lb/MMBtu, VOC: 0.0055 lb/MMBtu, NO<sub>x</sub> (as NO<sub>2</sub>): 7 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub>, or CO: 25 ppmv @ 3% O<sub>2</sub>. [District Rules 2201, 4201, 4301, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
10. A source test to demonstrate compliance with NO<sub>x</sub> and CO emission limits shall be performed within 60 days of initial startup of this unit. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
11. Source testing to measure NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
12. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate, no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
13. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
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18. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

19. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
20. All NO<sub>x</sub>, CO, and O<sub>2</sub> emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
21. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
22. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 4320] Federally Enforceable Through Title V Permit
23. If the steam generator is not fired on PUC-regulated natural gas and compliance is achieved through fuel sulfur content limitations, then the sulfur content of the fuel shall be determined by testing sulfur content at a location after all fuel sources are combined prior to incineration, or by performing mass balance calculations based on monitoring the sulfur content and volume of each fuel source. The sulfur content of the fuel shall be determined using the test methods referenced in this permit. [District Rule 4320] Federally Enforceable Through Title V Permit
24. Permittee shall maintain records of fuel gas sulfur compound measurements. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
25. If the unit is fired on PUC-regulated natural gas, valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy the fuel sulfur content analysis, provided they establish the fuel sulfur concentration and higher heating value. [District Rule 4320] Federally Enforceable Through Title V Permit
26. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**ISSUANCE DATE:** DRAFT

**PERMIT NO:** S-1326-418-2

**LEGAL OWNER OR OPERATOR:** CALIFORNIA RESOURCES PRODUCTION CORP  
**MAILING ADDRESS:** 9600 MING AVENUE, SUITE 300  
BAKERSFIELD, CA 93311

**LOCATION:** HEAVY OIL CENTRAL STATIONARY SOURCE  
KERN COUNTY, CA

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 85 MMBTU/HR NATURAL GAS-FIRED STEAM GENERATOR WITH COEN QLN-II ULTRA LOW NOX BURNER AND A FLUE GAS RECIRCULATION SYSTEM: AUTHORIZE COMBUSTION OF TEOR AND TVR GAS

**CONDITIONS**

1. {1829} The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
3. Steam generator shall be equipped with variable frequency drive electrical motors driving the blower and water pump and a convection section with at least 235 square feet of heat transfer surface area per MMBtu/hr of maximum rated heat input (verified by manufacturer) or a manufacturer's overall thermal efficiency rating of 88%. [Public Resources Code 21000-21177: California Environmental Quality Act and District Rule 2410] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. The unit shall only be fired on gas with a maximum sulfur content of 1.0 gr S/100scf. [District Rules 2201 4801, and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services

S-1326-418-2 : Jan 6 2015 8:36AM -- RINALDIR : Joint Inspection Required with RINALDIR

8. Permittee shall test annually the sulfur content of the fuel gas combusted in steam generator using ASTM method D1072, D3031, D4084, or D3246 and make test results readily available for District inspection. [District Rules 2520, 9.3.2 and 4320] Federally Enforceable Through Title V Permit
9. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
10. Emission rates shall not exceed: PM10: 0.003 lb/MMBtu, VOC: 0.0055 lb/MMBtu, NOx (as NO2): 7 ppmvd NOx @ 3% O2, or CO: 25 ppmv @ 3% O2. [District Rules 2201, 4201, 4301, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
11. A source test to demonstrate compliance with NOx and CO emission limits shall be performed within 60 days of initial startup of this unit. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
12. Source testing to measure NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
13. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Unless otherwise specified in the Permit to Operate, no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4320. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
14. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
15. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
16. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
17. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 5.5.5, 4306, 5.5.5, and 4320] Federally Enforceable Through Title V Permit
18. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, NOx (lb/MMBtu) - EPA Method 19; CO (ppmv) - EPA Method 10 or ARB Method 100; Stack gas oxygen (O2) - EPA Method 3 or 3A or ARB Method 100; stack gas velocities - EPA Method 2; Stack gas moisture content - EPA Method 4; SOx - EPA Method 6C or 8 or ARB Method 100; fuel gas sulfur as H2S content - EPA Method 11 or 15; and fuel hhv (MMBtu) - ASTM D 1826 or D 1945 in conjunction with ASTM D 3588. [District Rule 1081, 4305, 4306, 4320, and 4351] Federally Enforceable Through Title V Permit
19. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

20. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
21. All NO<sub>x</sub>, CO, and O<sub>2</sub> emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
22. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
23. PUC quality natural gas is any gaseous fuel where the sulfur content is no more than one-fourth (0.25) grain of hydrogen sulfide per one hundred (100) standard cubic feet, no more than five (5) grains of total sulfur per one hundred (100) standard cubic feet, and at least 80% methane by volume. [District Rule 4320] Federally Enforceable Through Title V Permit
24. If the steam generator is not fired on PUC-regulated natural gas and compliance is achieved through fuel sulfur content limitations, then the sulfur content of the fuel shall be determined by testing sulfur content at a location after all fuel sources are combined prior to incineration, or by performing mass balance calculations based on monitoring the sulfur content and volume of each fuel source. The sulfur content of the fuel shall be determined using the test methods referenced in this permit. [District Rule 4320] Federally Enforceable Through Title V Permit
25. Permittee shall maintain records of fuel gas sulfur compound measurements. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
26. If the unit is fired on PUC-regulated natural gas, valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy the fuel sulfur content analysis, provided they establish the fuel sulfur concentration and higher heating value. [District Rule 4320] Federally Enforceable Through Title V Permit
27. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

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**TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM**

**I. TYPE OF PERMIT ACTION (Check appropriate box)**

☐ SIGNIFICANT PERMIT MODIFICATION  
☒ MINOR PERMIT MODIFICATION

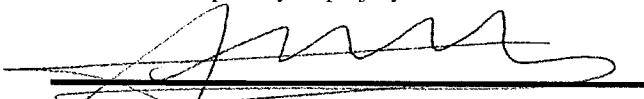
☐ ADMINISTRATIVE  
AMENDMENT

COMPANY NAME: VINTAGE PRODUCTION CALIFORNIA, LLC	FACILITY ID: S - 1326
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name:	
3. Agent to the Owner:	

**II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):**

- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- ☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- ☒ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

  
Signature of Responsible Official

10/8/2014  
Date

Anibal Araya

Name of Responsible Official (please print)

Operations Manager

Title of Responsible Official (please print)

Mailing Address: Central Regional Office \* 1990 E. Gettysburg Avenue \* Fresno, California 93726-0244 \* (559) 230-5900 \* FAX (559) 230-6061

TVFORM-009

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